



March 19, 2014

Duncan Anderson, President
Fortis College - Mobile
3590 Pleasant Valley Road
Mobile, AL 36609

UPS Tracking # 1ZA879640194777266

RE: **Final Program Review Determination**
OPE ID: 023410
PRCN: 2012-4-04-28049

Dear Mr. Anderson:

The U.S. Department of Education's (Department's) School Participation Division – Atlanta issued a program review report on February 7, 2013 covering Fortis College's (FC's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs), for the 2008-2009, 2009-2010, 2010-2011 and 2011-2012 award years. FC's final response was received on August 19, 2013. A copy of the program review report (and related attachments) and FC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by FC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, and (3) notify the institution of its right to appeal.

The total liabilities due from the institution from this program review are **\$1,192,759.39**

This FPRD contains detailed information about the liability determination for all findings.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information.

Federal Student Aid, School Participation Division - Atlanta
61 Forsyth Street SW, Room 18T40, Atlanta, GA 30303
www.FederalStudentAid.ed.gov

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To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample, Appendix B, Student Sample 2 and Appendix C, Student Interview Sample 3.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the February 7, 2013 program review report. If FC wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date FC receives this FPRD. An original and four copies of the information FC submits must be attached to the request. The request for an appeal must be sent to:

Ms. Mary E. Gust, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/PC
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

FC's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to FC's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).**

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Angelique James at 404-974-9441. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6); (b)(7)(C)

Chuck Engstrom
Division Director

Enclosure:

Protection of Personally Identifiable Information

cc: Felicia Williams, Financial Aid Administrator, Financial Aid Administrator
AL Dept of Postsecondary Education Private School Licensing Division
Accrediting Bureau of Health Education Schools

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for
Fortis College - Mobile

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OPEID: 023410
PRCN: 2012-4-04-28049

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division - Atlanta

Final Program Review Determination

March 19, 2014

Federal Student Aid, School Participation Division - Atlanta
61 Forsyth Street SW, Room 18T40, Atlanta, GA 30303
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A. Institutional Information

Fortis College - Mobile
3590 Pleasant Valley Road
Mobile, AL 36609

Type: Proprietary

Highest Level of Offering: Associates Degree

Accrediting Agency: Accrediting Bureau of Health Education Schools

Current Student Enrollment: 1,384 (as of 8/27/2012)

% of Students Receiving Title IV: 96% (as of 8/27/2012)

Title IV Participation: Postsecondary Education Participants System (PEPS)

2010-2011 Award Year

Federal Pell Grant Program (Pell)	\$7,832,340
Federal Supplemental Education Opportunity Grant (SEOG)	\$185,480
Federal Work Study (FWS)	\$90,723
William D. Ford Direct Loan Program (Direct Loan)	\$8,484,527

Default Rate FFEL/DL:	2011	8.2%
	2010	6.8%
	2009	7.1%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Fortis College - Mobile (FC) from September 10, 2012 to September 14, 2012. The review was conducted by Angelique James.

The focus of the review was an analysis of student eligibility for Title IV funds. The review consisted of an examination of FC's student files.

A sample of 40 files was identified for review from the 2009, 2010, 2011 and 2012 award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

In addition, three files were selected from the 2010 award year based on a news article published in March 2011 which discussed a lawsuit filed in Mobile, Alabama by three former students who stated that FC enrolled them in the cosmetology program in November 2009. The students stated that they were enrolled with the promise that FC would also provide a high school diploma upon successful completion of their cosmetology program to allow the three women to sit for the state licensing exam. The students completed their program and were given high school diplomas from American Southeast Academy (ASA) only to learn that the State of Alabama did not recognize ASA as a valid high school. Appendix B lists the names and partial social security numbers of the three additional students whose files were examined during the program review.

C. Findings and Final Determinations

Resolved Findings

Findings 3, 4, 5, 6, 8, 9, 10 and 11

FC has taken the corrective actions necessary to resolve findings 3, 4, 5, 6, 8, 9, 10 and 11 (Appendix H). Therefore, these findings may be considered closed. Findings requiring further action by FC are discussed below.

Findings with Final Determinations

The program review report findings requiring further action are summarized below. At the conclusion of the finding is a summary of FC's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on February 7, 2013 is attached as Appendix E.

Note: Any additional costs to the Department, including interest, special allowances, cost of funds, unearned administrative cost allowance, etc., are not included in individual findings, but instead are included in the summary of liabilities table in Section D of the report.

Finding 1. Ineligible High School Diploma

Citation Summary: 34 C.F.R. § 668.32(a)(2)(e)(1) states a student is eligible to receive Title IV, HEA program assistance if the student has a high school diploma or its recognized equivalent.

Noncompliance Summary: The institution's admission policy states "The applicant must provide documentation of graduation from high school or college in the form of a valid high school diploma or higher earned degree, transcript, or other acceptable valid documentation which confirms that the applicant meets or exceeds the academic achievement equivalent to a high school diploma in the USA. All official foreign documents submitted must be translated into English and evaluated to be equivalent or higher than a USA high school diploma".

There were eight students in a sample of 43 students who have an invalid high school diploma from American Southeastern Academy (ASA) or American Worldwide Academy (AWA) or had inconsistent information in their files regarding high school attendance.

In addition, an agent from the Department's Office of Inspector General (OIG) contacted ASA on December 6, 2010 to inquire about receiving a high school diploma. A representative from the school stated that individuals interested in a high school diploma do not take classes. Instead, individuals come to ASA's office, complete an application and receive materials. The high school diploma exam can be taken the same day that a person applies to ASA, and there are "links" available to take the exam. The charge for the diploma is \$450 and only high school diplomas are issued and not General Educational Development (GED) certificates.

Student 12: For the 2009-2010 award year, student 12's prospective student profile application indicated that the student graduated from Dixon Educational Center. However, there was a diploma from ASA in the file. Student 12 signed the FC enrollment agreement on 10/14/09. The ASA diploma lists the high school graduation date of 10/15/09.

Student 13: For the 2009-2010 award year, student 13's copy of a high school transcript from Jackson High School had a withdrawal date of 6/1/93. However, there was a diploma from ASA in the file. Student 13 signed the FC enrollment agreement on 2/15/10. The ASA diploma lists the high school graduation date of 2/16/10. This student was among the three students from the news article which discussed the lawsuit filed stating

that FC promised that it would provide a high school diploma upon successful completion of their cosmetology program.

- Student 14: For the 2009-2010 award year, student 14's prospective student profile application listed a "blank" for the name of the high school that the student graduated from. This form also indicated that the student received a high school diploma/GED on 5/27/05. However, there was a diploma from AWA in the file. Student 14 signed the FC enrollment agreement on 10/2/09. The AWA diploma lists the high school graduation date of 11/20/09.*
- Student 16: For the 2009-2010 award year, student 16's copy of a high school transcript from the Mississippi State Board of Education had no graduation data. However, there was a diploma from ASA in the file. Student 16 signed the FC enrollment agreement on 11/6/09. The ASA diploma lists the high school graduation date of 11/6/09. This student was among the three students from the news article which discussed the lawsuit filed stating that FC promised that it would provide a high school diploma upon successful completion of their cosmetology program.*
- Student 18: For the 2009-2010 award year, student 18's prospective student profile application indicated that the student attended Pascagoula High; however, there was a copy of a high school transcript from the Mississippi Permanent School Record with no graduation data in the file.*
- Student 19: For the 2009-2010 award year, there was a diploma from ASA in the file. Student 19 completed the Free Application for Federal Student Aid (FAFSA) on 2/09/10. The ASA diploma lists the high school graduation date of 2/9/10. This student was among the three students from the news article which discussed the lawsuit filed stating that FC promised that it would provide a high school diploma upon successful completion of their cosmetology program.*
- Student 21: For the 2009-2010 award year, there was a diploma from ASA in the file. Student 21 signed the FC enrollment agreement on 9/08/09. The ASA diploma lists the high school graduation date of 9/10/09.*
- Student 30: For the 2009-2010 award year, there was a diploma from ASA in the file. Student 30 signed the FC enrollment agreement on 2/25/10. The ASA diploma lists the high school graduation date of 2/22/10.*

When asked about the legitimacy of the ASA and AWA high school diplomas, the Financial Aid Director stated that FC stopped accepting these diplomas and all other online diplomas due to suspecting that these were not valid.

Required Action Summary: *Due to the significant error rates based on the sampling of the student files tested for the 2009-2010 award year, FC was required to determine the extent of non-compliance associated with this finding. The institution was required to perform a full file review for all of the 2009-2010 Title IV recipients admitted to the institution with an invalid high school diploma or with discrepant information regarding high school graduation.*

The institution was required to engage an Independent Public Accountant (IPA) to test the review completed by the institution. The IPA was also required to apply the agreed upon procedures to test the accounting completed by the institution, and prepare a report including any exceptions noted during its testing.

Along with the file review required for finding 1, FC was required to implement procedures to ensure the validity of high school diplomas before students are admitted and disbursed Title IV funds. FC was required to submit these procedures to the Department.

FC's Response: FC did not concur with this finding. The college made a number of arguments in response to this finding that were previously rejected in administrative litigation involving a different Fortis College, *In the Matter of Fortis College*, U.S. Dep't of Educ., Dkt. No. 12-55-SP (July 30, 2013) (currently on appeal to the Secretary). For all of the reasons identified by the hearing official in that decision, the Department does not find any of these arguments to be persuasive here.

FC also submitted the required full file review for all of the 2009-2010 Title IV recipients admitted to the institution with an invalid high school diploma or with discrepant information regarding high school graduation (Appendix K, L). Along with the file review required for finding 1, FC submitted its procedures to ensure the validity of high school diplomas before students are admitted and disbursed Title IV funds.

Final Determination: The institution failed to follow its admission policy to admit students with a valid high school diploma for the 2009-2010 award year.

1. As mentioned in the Program Review Report (PRCN: 2012-4-04-28049), three files were selected from the 2010 award year based on a news article published in March 2011 which discussed a lawsuit filed in Mobile, Alabama by three former students who stated that FC enrolled them in its cosmetology program in November 2009. The students stated that they were enrolled with the promise that FC would also provide a high school diploma upon successful completion of their cosmetology program to allow the three women to sit for the state licensing exam. The students completed their program and were given high school diplomas from ASA only to learn that the State of Alabama does not recognize ASA as a valid high school.

2. The Department conducted an analysis of FC's file review and identified 249 students who received HS diplomas from ASA which represents 11.2% of the student population (249 of 2221 files reviewed for the entire award year) for the award year in question. The file review also identified 30 students who received HS diplomas from AWA. According to FC's PRR response, the institution ceased to accept ASA and AWA diplomas in May 2010. Therefore, for a partial award year (approximately 9-10 months) FC's student population with an ASA or AWA HS diploma was above 12.6%. The Department believes that such a high percentage from an out-of-state school in a short amount of time should have created suspicion in the mind of a reasonable FAD.¹
3. The Department's analysis also pointed out the following concerns:

For the six students in our sample with ASA HS Diplomas, three out of the six had conflicting documentation in the file indicating they had attended but not graduated from another high school other than ASA. Student 12's prospective student profile application indicated the student attended Dixon Educational Center and had not graduated. Student 13's file contained a copy of a high school transcript from Jackson High School and had a withdrawal date of 6/1/93. Student 16's file contained a copy of a high school transcript from the Mississippi State Board of Education but had no graduation data. Two of these students were part of the three students from the news article which discussed the lawsuit filed stating that FC promised that it would provide an ASA high school diploma upon successful completion of their cosmetology program. These discrepancies should have prompted the FAD to research and resolve this conflicting information.

4. For the 2009-2010 award year, the reviewers found seven students in the sample who appeared to have invalid high school diplomas from ASA (six students) or AWA (1 student). Of these six students who appeared to have an invalid high school diploma from ASA, one student's high school graduation date from ASA was only three days before the student's enrollment agreement signed date, one student's high school graduation date from ASA was only two days before the enrollment agreement signed date, two students' high school graduation date from ASA was only one day before the students' enrollment agreement signed date, and two students' high school graduation dates from ASA were on the exact same day of the students' enrollment agreement signed date. In summary, all six students' high school graduation dates were within 0-3 days of the student's enrollment agreement signed date. This short window from a student's graduation date to the enrollment request of the student should have been a flag to FC's school officials to investigate ASA further.

¹ According to corporate records filed with the state of Florida, AWA's present Director was formerly the President/Director of ASA.

5. Subsequent to being on site, the reviewers interviewed students (1-I – 5-I) identified by FC as having a high school diploma from ASA or AWA (Appendix C). These interviews revealed several instances where FC students acknowledged that they applied to ASA, had a take home test very shortly after applying to ASA, had no classroom training, no attendance, and received their diploma for a fee within a short amount of time. Most of the students stated that a FC employee referred the student to ASA or AWA for a high school diploma. Two students stated that a FC financial aid official told them that FC had a contract with ASA to supply high school diplomas to students who had not graduated high school in order for these students to be enrolled into FC.

Student 1-I: For the 2009-2010 award year, student 1-I stated that she was offered the AWA diploma from a FC school official. The student stated that the FC official told her that the AWA high school diploma was accredited but the student was later informed by FC's Cosmetology Director that it was not an accredited high school diploma. This student received the AWA diploma approximately 3-4 weeks after applying for the AWA high school diploma.

Student 2-I: For the 2009-2010 award year, student 2-I stated that an FC official gave Student 2-I the ASA application. Student 2-I stated that she did not attend any classes (classroom or online) before receiving the ASA high school diploma. This student received the ASA diploma approximately 2 weeks after applying for the ASA high school diploma.

Student 4-I: For the 2009-2010 award year, student 4-I stated that someone in the Financial Aid Office at FC offered her the ASA high school diploma due to only finishing the 10th grade. The FC official gave Student 4-I the ASA application. Student 4-I stated that the Fortis official said that FC had a contract with ASA and that if Student 4-I paid a fee, she would not have to take any classes and would receive an ASA high school diploma. Student 4-I stated that she was also told that since she was enrolled at FC, the fee was only \$100 due to the contractual arrangement ASA had with FC, but that for a student not enrolled in FC, the fee was \$450 (this amount corresponds with the OIG's investigation). Student 4-I paid the \$100 fee and received an emailed test from ASA the next day. The student did not attend any classes (classroom or online). Student 4-I took the ASA test and emailed her answers back to ASA and received a high school diploma in 2-3 weeks after applying.

Student 5-I: For the 2009-2010 award year, student 5-I stated that someone in the Financial Aid Office at FC offered her the ASA high school diploma. The FC official gave Student 5-I the ASA application and the student was told that FC had a contract with ASA. The student did not attend any classes (classroom or online). Student 5-I paid the \$100 fee and received an

emailed test from ASA on the same day. This student received the ASA diploma approximately 2-3 days after applying for the high school diploma. Student 5-I also stated that after withdrawing from FC, she tried to enroll in a local State of Alabama post-secondary institution. Student 5-I was denied admission due to the local State of Alabama post-secondary institution officials informing the student that her ASA diploma was not valid.

Summary: Based on the evidence from the OIG investigation and student interviews the Department has determined that ASA and AWA are not valid high schools. This evidence indicates that ASA and AWA only gave students a take home test very shortly after applying, had no classroom training, no attendance, and students received their diploma for a fee within a short amount of time. Also, the high percentage of ASA and AWA diplomas, the Department's analysis of date and high school transcript discrepancies and the student interviews, the Department has concluded that FC officials pointed the students in the direction of ASA/AWA and/or made provisions to provide high school diplomas to a student who otherwise did not possess a valid high school diploma and would not have been eligible for Title IV funds.

FC performed the requested file review of all of the 2009-2010 Title IV recipients admitted to the institution with an invalid high school diploma or with discrepant information regarding high school graduation (Appendix K). The file review determined that there were 249 students with ASA high school diplomas and 30 students with AWA diplomas. The file review also determined that there were also 20 students who were admitted and disbursed Title IV aid in which FC determined that the student's high school diplomas were invalid (Appendix L). The file review identified total liabilities (for award year 2009-2010) totaling **\$1,091,317.23** (includes Estimated Actual Loss – Appendix J, does not include Cost of Funds).

Finding 2. Pell overpayment/underpayment

Citation: 34 C.F.R. § 690.75(a)(1) states that for each payment period, a school must pay a Federal Pell Grant to an eligible student only after it determines that the student qualifies as an eligible student under 34 C.F.R. § 668, Subpart C. In addition, 34 C.F.R. § 690.63(b) specifically states that Federal Pell Grant payments for a payment period are calculated by determining the student's enrollment status for the term, and determining his or her annual award from the payment schedule for full-time students or the disbursement schedule for three-quarter time, half-time, or less than half-time students, and dividing that amount by three (for institutions using quarters).

Noncompliance: The institution failed to pay the correct annual award from the Pell payment schedule for twelve students in a sample of 43.

- Student 2: For the 2008-2009 award year, on 4/1/09, student 2 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 3/23/09 - 5/29/09. The student's estimated family contribution (EFC) was \$0. However, the student was actually a half time student enrolled in 8 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 2 should have received \$788 (\$2,366 divided by 3 semesters) for the term. A Pell refund was done on 4/6/09 for \$1,183; however, this refund was done incorrectly.*
- Student 5: For the 2008-2009 award year, on 12/1/08, student 5 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 11/24/08 - 2/13/09. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 5 should have received \$788 (\$2,366 divided by 3 semesters) for the term. A Pell refund was done on 1/26/09 for \$788.*
- Student 8: For the 2008-2009 award year, on 6/17/09, student 8 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 4/27/09 - 7/3/09. The student's EFC was \$0. However, the student was actually a half time student enrolled 7.5 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 8 should have received \$788 for the term. A Pell refund was done on 7/7/09 for \$788.*
- Student 10: For the 2008-2009 award year on 3/25/09, student 10 was given a half time Pell award of \$788 (\$2,366 divided by 3 semesters) for the term 3/23/09 - 5/29/09. Student 10 was given another half time Pell award of \$788 (\$2,366 divided by 3 semesters) for the term 6/1/09 - 8/7/09 on 6/8/08. The student's EFC was \$0. However, the student was actually a three quarter time student enrolled in 10 credit hours for the first semester and a full time student enrolled in 12 credit hours for the second semester. According to the 2008-2009 Pell annual award payment schedule for three-quarter time students, Student 10 should have received \$1,182 for the first term and \$1,576 for the second term. A Pell refund was done on 9/17/09 for \$891; however, this refund was done incorrectly.*
- Student 12: For the 2010-2011 award year on 7/27/10, student 12 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/5/10 - 9/10/10. The student's EFC was \$0. However, the student was actually a three quarter time student enrolled in 10 credit hours for the semester. According to the 2010-2011 Pell annual award payment schedule for three-quarter time students, Student 12 should have received \$1,375 for the term. As of yet, a Pell refund has not been done. FC must return \$475 to the Department.*

- Student 14: For the 2009-2010 award year on 2/17/10, student 14 was given a full time Pell award of \$1,784 (\$5,350 divided by 3 semesters) for the term 2/15/10 – 4/23/10. The student's EFC was \$0. However, the student was actually a half time student enrolled in 7.5 credit hours for this semester. According to the 2009-2010 Pell annual award payment schedule for half time students, Student 14 should have received \$892 for the term. As of yet, a Pell refund has not been done. FC must return \$892 to the Department.*
- Student 25: For the 2011-2012 award year on 8/10/11, student 25 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 8/8/11 – 10/13/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for half time students, Student 25 should have received \$925 for the term. As of yet, a Pell refund has not been done. FC must return \$925 to the Department.*
- Student 28: For the 2011-2012 award year on 7/7/11, student 28 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/5/11 – 9/9/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for half time students, Student 28 should have received \$925 for the term. A Pell refund was done on 8/30/11 for \$1,422; however, this refund was done incorrectly. To correct this issue, a Pell adjustment was done on 3/9/12 for \$497.*
- Student 29: For the 2010-2011 award year on 10/20/10, student 29 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 10/18/10 – 1/7/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2010-2011 Pell annual award payment schedule for half time students, Student 29 should have received \$925 for the term. A Pell refund was done on 12/20/10 for \$925.*
- Student 32: For the 2010-2011 award year on 7/12/10, student 32 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/6/10 – 9/10/10. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2010-2011 Pell annual award payment schedule for half time students, Student 32 should have received \$925 for the term. A Pell refund was done on 9/9/10 for \$925.*

Student 37: For the 2010-2011 and 2011-2012 award years on 1/24/11, 4/8/11, 8/26/11, 10/7/11 and 1/12/12 student 37 was given a full time Pell award of \$1,834 (\$5,500 divided by 3 semesters) for the January 2011, April 2011, July 2011, October 2011 and January 2012 terms. The student's EFC was \$15 for both award years. However, the student was actually a three quarter time student enrolled in 9 credit hours for the January 2011 semester. Student 37 was a half time student for the April 2011, July 2011 and October 2011 semesters enrolled in 8 credit hours, 7.5 credit hours and 8 credit hours respectively. Student 37 was actually a three quarter time student enrolled in 9 credit hours for the January 2012 semester. According to the 2010-2011 Pell annual award payment schedule for three quarter time students, Student 37 should have received \$1,375 for the January 2011 term and \$916 for the April 2011. According to the 2011-2012 Pell annual award payment schedule for half time students, Student 37 should have received \$916 for the July 2011 and October 2011 terms and \$1,375 for the January 2012 term. As of yet, a Pell refund has not been done. FC must return \$3,672 to the Department.

Student 41: For the 2011-2012 award year on 9/26/11, student 41 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 09/27/11 – 11/7/11. The student's EFC was \$0. However, the student was actually a three quarter student enrolled in 9 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for three quarter time students, Student 41 should have received \$1,387 for the term. As of yet, a Pell refund has not been done. FC must return \$463 to the Department

Required Action: *Due to the significant error rates based on the sampling of the student files tested for the 2008-2009, 2010-2011 and 2011-2012 award years, FC was required to determine the extent of non-compliance associated with this finding. The Institution was required to perform a full file review for all of the 2008-2009, 2010-2011 and 2011-2012 Federal Pell Grant recipients. File reviews were to be performed for all Federal Pell Grant recipients except those included in the Appendix A and Appendix B of the Program Review Report for the respective award years.*

The institution was required to engage an IPA to test the review completed by the institution. The IPA was also required to apply the agreed upon procedures to test the accounting completed by the institution, and prepare a report including any exceptions noted during its testing.

Along with the file review required for finding 1, FC was required to develop a policy to ensure Pell overpayment/underpayments do not occur in the future. This policy was to detail how the financial aid office will be informed of a student's status (full time, three quarter, half time, less than half time) and the methods financial aid will use to determine

Pell eligibility and disbursement. FC was required to submit this policy to the Department.

Amended Required Action Summary: *A letter from FC dated April 3, 2013 was mailed to the Department in response to the February 7, 2013 Program Review Report (Appendix E). In FC's letter, the institution provided additional documentation in response to Finding 2: Pell Overpayment / Underpayment and Finding 3: Return to Title IV not calculated correctly. For Finding 2, FC was originally required to perform a full file review for all of the 2008-2009, 2010-2011 and 2011-2012 Federal Pell Grant recipients. FC's letter dated April 3, 2013 provided additional documentation to the Department in order to attempt to eliminate the requirement for any file reviews. The School Participation Division-Atlanta reviewed FC's letter and due to the additional documentation received from FC, the institution was only required to perform a file review for the 2008-2009 award year. A response letter detailing the revised file review requirement was issued by the Department to FC on April 15, 2013 (Appendix G).*

FC's Response: FC stated that the college's staff responsible for awarding, recalculating and posting Pell Grants was made aware of the errors identified in this finding. The staff was provided with additional training on the procedures required by the Department. In addition, internal review procedures were implemented in which the Senior Financial Aid staff reviewed Pell amounts to be certain that they coincide with the correct version of the student's ISIR and/or the student's correct enrollment status. Emphasis in the additional training was purportedly placed on academic changes to the number of credit hours attempted after the initial Pell Grant disbursement was made for the payment period and the importance of adjusting and making refunds or additional Pell disbursements in a timely manner. FC developed a Pell Grant disbursement policy and submitted these policies to the Department for review. FC also submitted the required full file review for all of the 2008-2009 Federal Pell Grant recipients (Appendix M).

Final Determination: The institution failed to pay the correct annual award from the Pell payment schedule for enrolled students in the 2008-2009 award year. The program review report identified 12 students in which this finding was found. By providing additional documentation on April 3, 2013, FC was able to resolve 10 of the 12 student findings (student #5, #8, #12, #14, #25, #28, #29, #32, #37 and #41). For the remaining two students (#2 and #10), Pell overpayments were already corrected by FC prior to the program review, so no additional required action was necessary. For the remaining students not in the sample, the institution performed the requested file review of all of the 2008-2009 Federal Pell Grant recipients (Appendix M). The file review determined that the amount of Pell overawards for 2008-2009 was **\$49,161** (not including cost of funds).

Finding 7. Federal Work Study Violations-Student Working during class hours

Citation: *Pursuant to 34 C.F.R. § 675.16, Federal Work-Study Program (FWS), an institution must pay a student FWS compensation at least once a month. It is the school's*

responsibility to monitor the FWS program. Students may not be scheduled for work and miss class time to perform FWS jobs.

Noncompliance: *The institution failed to monitor FWS time sheets adequately. FWS students performed FWS jobs while scheduled for class as illustrated below:*

- Student #7 For the 2008-2009 award year, student #7 worked FWS hours during the same period classes were scheduled. A review of the payroll time sheet on 4/16/09 indicates that the student worked from 12:00PM to 5:30PM. According to the enrollment agreement, the student's class schedule was Monday to Thursday from 8:10AM to 2:25PM. According to the student's timesheet and pay schedule, the student was paid \$24.10 for hours worked while also scheduled for class (\$10.00 per hour @2.41 hours=\$24.10).*
- Student #10 For the 2008-2009 award year, student #10 worked FWS hours during the same period classes were scheduled. A review of the payroll time sheet on 5/21/09, 5/26/09, 5/27/09 and 5/28/09 indicates that the student worked from 2:15PM to 9:15PM on 5/21/09, 2:15PM to 6:15PM on 5/26/09, 2:15PM to 6:15PM on 5/27/09 and 2:15PM to 6:15PM on 5/28/09. According to the enrollment agreement, the student's class schedule was Monday to Thursday from 5:50PM to 9:50PM. According to the student's timesheet and pay schedule, the student was paid \$41.94 for hours worked while also scheduled for class (\$9.00 per hour @4.66 hours=\$41.94).*
- Student #33 For the 2010-2011 award year, student #33 worked FWS hours during the same period classes were scheduled (Appendix D). According to the enrollment agreement, the student's class schedule was Monday to Thursday from 8:10AM to 2:25PM.*
- Student #42 For the 2011-2012 award year, student #42 worked FWS hours during the same period classes were scheduled. According to the enrollment agreement, the student's class schedule was Monday to Thursday from 8:10AM to 2:25PM.*
- Student #43 For the 2011-2012 award year, student #43 worked FWS hours during the same period classes were scheduled. The student's class schedule was Monday to Thursday from 8:10AM to 2:25PM.*

Required Action: *In its response, FC was required to provide documentation that students listed above were not scheduled for classes while working a FWS job.*

Due to the significant error rates (2008-2009 - 2 FWS errors out of 2 FWS students; 2011-2012 - 2 FWS errors out of 2 FWS students) based on the sampling of the student

files tested for the award years, FC was required to determine the extent of non-compliance associated with this finding. The Institution was required to perform a full file review for all of the 2008-2009 and 2011-2012 Federal Work Study recipients. File reviews were to be performed for all Federal Work Study recipients except those included in the Appendix A of the Program Review Report for the respective award years. FC was also required to create a spreadsheet similar to the one created for student #33 (Appendix D) to determine the amount of FWS hours worked during class hours for each of the students listed above for the corresponding award years.

FC's Response: FC stated that the financial aid staff responsible for the FWS program has been given additional training on how to monitor a student's time records to ensure that there is no conflict with a student's class schedule. FC also submitted the required full file review for all of the 2008-2009 and 2011-2012 Federal Work Study recipients with the exception of those FWS students in Appendix A (Appendix N).

Final Determination: The institution failed to pay the correct FWS award for students enrolled in the 2008-2009 and 2011-2012 award years. For students in the reviewer's sample (#7, #10, #33, #42 and #43), the total amount of FWS federal share funds paid while scheduled for classes is \$440.23 (Appendix D & see Table 1).

Award Year	Sample Student #	FWS Rate per Hour	Hours Worked during Scheduled Class	Total FWS Paid while Scheduled for Class	Total FWS Federal Share
2008-2009	7	\$10.00	2.41	\$24.10	\$18.08
2008-2009	10	\$9.00	4.66	\$41.94	\$31.46
2010-2011	33	\$10.00	11.36	\$113.60	\$85.20
2011-2012	42	\$11.00	23.39	\$282.15	\$211.61
2011-2012	43	\$7.25	17.16	\$125.18	\$93.89
				TOTAL	\$440.23

Table 1

For the remaining students not in the sample, the institution performed the requested file review of all of the 2008-2009 and 2011-2012 FWS recipients (Appendix N). The file review determined that the amount of FWS federal funds paid while students were scheduled for classes in 2008-2009 was \$771 and in 2011-2012 was \$1,391 (federal share). FC sent documentation to the Department to indicate that the FWS federal share of \$771 was refunded to the 2008-2009 award year and the FWS federal share of \$1,391 was refunded to the 2011-2012 award year (Appendix O).

D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the program review determination is as follows.

Liabilities	Pell (Closed Award Year)	FSEOG ²	FWS ³	EALF DL	
Finding 1	\$1,043,275.00	\$9,123.75	\$1,937.86		
Finding 2	\$49,161.00	\$0	\$0		
Finding 7	\$0	\$0	\$2,602.23 ⁴		
Subtotal 1	\$1,092,436.00	\$9,123.75	\$4,540.09	\$36,980.62	
FC Paid on 10/31/2013			-\$2,162.00		
Subtotal 2	\$1,092,436.00	\$9,123.75	\$2,378.09		
Interest/SA	\$51,360.38	\$382.24	\$98.31		
TOTAL	\$1,143,796.38	9,505.99	\$2,476.40	\$36,980.62	
Payable To: Department					Totals
					\$1,192,759.39

Estimated Actual Loss (EAL):

In lieu of requiring the institution to assume the risk of default by purchasing the ineligible loan from the holder, the Department has asserted a liability not for the loan amount, but rather for the estimated actual or potential loss that the government may incur with respect to the ineligible loan or loan amount. The estimated actual loss to the Department that has resulted or will result from those ineligible loans is based on FC's most recent cohort default rate available (2011 -8.2%).

The total amount of Direct Loans that FC improperly disbursed during the 2009/2010 award year for Finding 1 is \$ 891,035.17. The total estimated actual loss that FC must

² Federal Share - FSEOG - Federal Supplemental Educational Opportunity Grant; \$12,165 federal share of \$9,123.75

³ Federal Share - FWS - Federal Work Study; \$3,170.78 federal share of \$2,378.09

⁴ \$2,602.23 = \$440.23 (sample students) + \$771 (2008/2009 file review) + \$1,391 (2011/2012 file review)

pay to the Department for the ineligible loans is **\$36,980.62**. Copies of the results of those calculations are included in Appendix J.

E. Payment Instructions

1. Liabilities Owed to the Department

FC owes to the Department **\$1,192,759.39**. This liability must be paid using an electronic transfer of funds through the Treasury Financial Communications System, which is known as FEDWIRE. FC must make this transfer within **45 days of the date of this letter**. This repayment through FEDWIRE is made via the Federal Reserve Bank in New York. If FC's bank does not maintain an account at the Federal Reserve Bank, it must use the services of a correspondent bank when making the payments through FEDWIRE.

Any liability of \$100,000 or more identified through a program review must be repaid to the Department via FEDWIRE. The Department is unable to accept any other method of payment in satisfaction of these liabilities.

Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable findings and Section 2 – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if applicable).

Instructions for completing the electronic fund transfer message format are included on the attached FEDWIRE form (Appendix O).

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. FC is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to FC's account representative.

If full payment cannot be made within **45 days** of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, FC has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due FC from the Federal Government. **FC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, FC must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

2. Instructions by Title IV, HEA Program

Direct Loan Estimated Actual Loss

Finding: 1

Appendix: J

DL Estimated Actual Loss	
Amount	Award Year
\$36,980.62	2009/2010
Total	
\$36,980.62	

FC must pay the amount reflected above in Direct Loan estimated loss liabilities for the award years reflected above. The liabilities will be applied to the general Direct Loan fund. This amount is also reflected in the total amount owed to the Department in Section 1 above.

Campus Based Programs

Findings: 5, 7

Appendix: N

FC must make corrections to its FISAP for award years 2008-2009, 2009-2010, 2010-2011 and 2011-2012 as follows:

- Log into eCB and make change(s) to the Working Copy, click on Submit and choose "Change Request". Provide the justification for the changes in the comments box, including that the changes are a result of a program review and include the Program Review Control Number - PRCN: 2012-4-04-28049
- Once the request is approved, submit the changes within 5 days.
- Changes to the FISAP may result in changes to subsequent FISAPS. Contact the eCB Call Center at (877) 801-7168 for assistance in making this determination.

FWS and FSEOG:

- If the recalculation of FC's funding results in an unprocessed deobligation (negative balance) because FC has drawn down its full authorization, return those funds via G5 in accordance with the automated notification from eCB. If the FC has not drawn down its full authorization, the authorization will be reduced.

FC must submit proof of the FISAP corrections and payment via G5 for any unprocessed deobligation (if applicable) to Angelique James **within 45 days of the date of this letter**.

Pell- Closed Award Year

Finding: 1, 2

Appendix: M

FC must repay:

Pell Closed Award Year			
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
\$49,161.00	\$7,652.79	Pell	2008-2009
\$1,043,275	\$43,707.59	Pell	2009-2010
Total Principal	Total Interest		
\$1,092,436	\$51,360.38		

The disbursement record for each student identified in Appendix K and Appendix L to the applicable finding must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the Appendix K and Appendix L.

Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.

A copy of the adjustment to each student's COD record must be sent to Angelique James **within 45 days of the date of this letter.**

Request Extended Processing

COD adjustments are necessary for the closed award years listed above. Before any student level adjustments can be processed, FC must immediately request extended processing through the COD Website (<http://cod.ed.gov>).

- Click on the Request Post Deadline/Extended Processing link under the School menu.
- On the request screen, the institution should indicate in their explanation that the request is based on a program review, and provide the program review control number - **PRCN 2012-4-04-28049**.
- The institution will be notified of the status of the request at the time of submission, and will also be notified by email to the FAA and President when extended processing has been authorized. At that time, the school must transmit student/borrower level adjustments to COD for the closed award years.

F. Appendices

Appendix A - Student Sample #1

School: Fortis College - Mobile
OPEID: 023410

Student #	Award Year	SSN last 4#	Last Name	First Name	Campus
1	2008/2009	(b)(6); (b)(7)(C)			Pensacola
2	2008/2009				Montgomery
3	2008/2009				Montgomery
4	2008/2009				Mobile
5	2008/2009				Montgomery
6	2008/2009				Mobile
7	2008/2009				Mobile
8	2008/2009				School of Cosmetology
9	2008/2009				Mobile
10	2008/2009				Montgomery
11	2009/2010				Montgomery
12	2009/2010				Pensacola
14	2009/2010				Pensacola
15	2009/2010				Mobile
17	2009/2010				Montgomery
18	2009/2010				Mobile
20	2009/2010				Pensacola
21	2009/2010				School of Cosmetology
22	2009/2010				Montgomery
23	2009/2010				Mobile
24	2010/2011				Pensacola
25	2010/2011				Mobile
26	2010/2011				Mobile
27	2010/2011				Pensacola
28	2010/2011				Mobile
29	2010/2011				Montgomery
30	2010/2011				School of Cosmetology
31	2010/2011				Pensacola
32	2010/2011				Montgomery
33	2010/2011				Mobile
34	2011/2012				School of Cosmetology

Student #	Award Year	SSN last 4#	Last Name	First Name	Campus
35	2011/2012	(b)(6); (b)(7)(C)			Montgomery Nursing
36	2011/2012				Mobile
37	2011/2012				Pensacola
38	2011/2012				Pensacola
39	2011/2012				Montgomery
40	2011/2012				Montgomery
41	2011/2012				Montgomery Nursing
42	2011/2012				Mobile
43	2011/2012				Montgomery

Confidential - This document contains Personally Identifiable Information

Appendix B - Student Sample #2
School: Fortis College - Mobile
OPEID: 023410
PRCN: 2012-4-04-28049

Student #	Award Year	SSN last 4#	Last Name	First Name	Campus
13	2009/2010	(b)(6); (b)(7)(C)			School of Cosmetology
16	2009/2010				School of Cosmetology
19	2009/2010				School of Cosmetology

Confidential - This document contains information that is exempt from public release under the Freedom of Information Act.

Appendix C - Student Interview Sample #3

School: Fortis College - Mobile

OPEID: 023410

Student #	Award Year	SSN - last 4#	Last Name	First Name
1-I	2009/2010	0754	(b)(6); (b)(7)(C)	
2-I	2009/2010	2959		
4-I	2009/2010	4764		
5-I	2009/2010	5375		

Confidential - This document contains Personally Identifiable Information

Appendix D – Finding 7: Federal Work Study Student #33

School: Fortis College - Mobile

OPEID: 023410

PRCN: 2012-4-04-28049

Date	Hours Worked	Hours Scheduled for Class	Hours Worked w/Class Scheduled
3/1/10	2:00PM to 5:00PM	8:10AM to 2:25PM	.42
3/2/10	2:00PM to 5:00PM	8:10AM to 2:25PM	.42
3/4/10	2:00PM to 3:00PM	8:10AM to 2:25PM	.42
4/13/10	2:00PM to 5:00PM	8:10AM to 2:25PM	.42
4/14/10	2:07PM to 4:26PM	8:10AM to 2:25PM	.30
4/15/10	2:09PM to 4:00PM	8:10AM to 2:25PM	.27
4/19/10	2:11PM to 5:00PM	8:10AM to 2:25PM	.23
4/20/10	2:23PM to 5:17PM	8:10AM to 2:25PM	.03
4/21/10	2:17PM to 4:16PM	8:10AM to 2:25PM	.13
4/22/10	12:26PM to 2:48PM	8:10AM to 2:25PM	.2
4/26/10	2:17PM to 5:15PM	8:10AM to 2:25PM	.13
4/27/10	2:21PM to 5:20PM	8:10AM to 2:25PM	.07
4/28/10	2:15PM to 4:21PM	8:10AM to 2:25PM	.17
4/29/10	2:13PM to 4:32PM	8:10AM to 2:25PM	.20
5/3/10	2:17PM to 5:21PM	8:10AM to 2:25PM	.13
5/5/10	11:21AM to 12:26PM 2:19PM to 5:34PM	8:10AM to 2:25PM	1.18
5/6/10	2:17PM to 4:44PM	8:10AM to 2:25PM	.13
5/11/10	2:19PM to 5:25PM	8:10AM to 2:25PM	.10
5/12/10	2:19PM to 4:37PM	8:10AM to 2:25PM	.10
5/17/10	2:17PM to 5:29PM	8:10AM to 2:25PM	.13
5/18/10	2:14PM to 5:31PM	8:10AM to 2:25PM	.18
5/19/10	2:22PM to 5:35PM	8:10AM to 2:25PM	.05
5/24/10	2:19PM to 5:19PM	8:10AM to 2:25PM	.10
5/27/10	12:17PM to 2:22PM	8:10AM to 2:25PM	2.13
6/1/10	2:17PM to 5:47PM	8:10AM to 2:25PM	.13
6/2/10	2:06PM to 5:49PM	8:10AM to 2:25PM	.32
6/3/10	2:15PM to 5:22PM	8:10AM to 2:25PM	.17
6/7/10	2:15PM to 6:28PM	8:10AM to 2:25PM	.17
6/8/10	2:07PM to 6:54PM	8:10AM to 2:25PM	.30
6/9/10	2:20PM to 6:48PM	8:10AM to 2:25PM	.08
6/10/10	2:17PM to 3:16PM	8:10AM to 2:25PM	.13
6/14/10	2:18PM to 5:29PM	8:10AM to 2:25PM	.12

Date	Hours Worked	Hours Scheduled for Class	Hours Worked w/Class Scheduled
6/15/10	2:10Pm to 6:00PM	8:10AM to 2:25PM	.25
6/16/10	2:10PM to 6:16PM	8:10AM to 2:25PM	.25
TOTAL HOURS WORKED DURING CLASS SCHEDULE			11.36

Appendix D – Finding 7: Federal Work Study Student #42

School: Fortis College - Mobile

OPEID: 023410

PRCN: 2012-4-04-28049

Date	Work Start Time	Work End Time	Class Start Time	Class End Time	Hours Worked w/Class Scheduled Start
10/18/2011	3:30 PM	6:30 PM	8:10 AM	2:25 PM	0
10/19/2011	2:20 PM	6:00 PM	8:10 AM	2:25 PM	0:05
10/20/2011	1:24 PM	5:30 PM	8:10 AM	2:25 PM	1:01
10/24/2011	2:20 PM	5:58 PM	8:10 AM	2:25 PM	0:05
10/27/2011	3:08 PM	6:00 PM	8:10 AM	2:25 PM	0:00
11/1/2011	2:16 PM	5:52 PM	8:10 AM	2:25 PM	0:09
11/3/2011	2:43 PM	5:30 PM	8:10 AM	2:25 PM	0:00
11/7/2011	2:30 PM	5:30 PM	8:10 AM	2:25 PM	0:00
11/8/2011	2:35 PM	5:30 PM	8:10 AM	2:25 PM	0:00
11/10/2011	2:30 PM	5:30 PM	8:10 AM	2:25 PM	0:00
11/15/2011	2:30 PM	5:30 PM	8:10 AM	2:25 PM	0:00
11/16/2011	2:39 PM	5:24 PM	8:10 AM	2:25 PM	0:00
11/21/2011	2:32 PM	6:32 PM	8:10 AM	2:25 PM	0:00
11/22/2011	2:35 PM	6:31 PM	8:10 AM	2:25 PM	0:00
12/5/2011	2:30 PM	5:30 PM	8:10 AM	2:25 PM	0:00
12/6/2011	2:20 PM	5:10 PM	8:10 AM	2:25 PM	0:05
12/7/2011	2:25 PM	6:00 PM	8:10 AM	2:25 PM	0:00
12/13/2011	2:40 PM	5:31 PM	8:10 AM	2:25 PM	0:00
12/15/2011	12:15 PM	2:30 PM	8:10 AM	2:25 PM	2:10
12/19/2011	9:18 AM	10:40 PM	8:10 AM	2:25 PM	5:07
1/2/2012	3:11 PM	5:43 PM	8:10 AM	2:25 PM	0:00
1/4/2012	2:38 PM	4:56 PM	8:10 AM	2:25 PM	0:00
1/23/2012	2:12 PM	4:43 PM	8:10 AM	2:25 PM	0:13
1/24/2012	2:14 PM	5:00 PM	8:10 AM	2:25 PM	0:11
1/25/2012	2:14 PM	4:38 PM	8:10 AM	2:25 PM	0:11
1/30/2012	2:17 PM	4:56 PM	8:10 AM	2:25 PM	0:08
1/31/2012	2:12 PM	4:48 PM	8:10 AM	2:25 PM	0:13
2/1/2012	2:12 PM	4:06 PM	8:10 AM	2:25 PM	0:13
2/2/2012	2:13 PM	4:49 PM	8:10 AM	2:25 PM	0:12
2/7/2012	2:14 PM	4:35 PM	8:10 AM	2:25 PM	0:11
2/8/2012	2:13 PM	4:39 PM	8:10 AM	2:25 PM	0:12
2/13/2012	2:14 PM	4:44 PM	8:10 AM	2:25 PM	0:11

Date	Work Start Time	Work End Time	Class Start Time	Class End Time	Hours Worked w/Class Scheduled Start
2/14/2012	2:13 PM	5:20 PM	8:10 AM	2:25 PM	0:12
2/15/2012	2:11 PM	3:38 PM	8:10 AM	2:25 PM	0:14
2/22/2012	2:14 PM	3:05 PM	8:10 AM	2:25 PM	0:11
2/23/2012	1:57 PM	5:13 PM	8:10 AM	2:25 PM	0:28
2/28/2012	2:15 PM	4:40 PM	8:10 AM	2:25 PM	0:10
2/29/2012	2:16 PM	4:02 PM	8:10 AM	2:25 PM	0:09
3/1/2012	2:15 PM	2:57 PM	8:10 AM	2:25 PM	0:10
3/5/2012	2:28 PM	4:17 PM	8:10 AM	2:25 PM	0:00
3/6/2012	2:18 PM	3:30 PM	8:10 AM	2:25 PM	0:07
3/7/2012	12:03 PM	3:12 PM	8:10 AM	2:25 PM	2:22
3/8/2012	2:14 PM	4:01 PM	8:10 AM	2:25 PM	0:11
3/12/2012	2:14 PM	5:22 PM	8:10 AM	2:25 PM	0:11
3/13/2012	2:14 PM	4:01 PM	8:10 AM	2:25 PM	0:11
3/14/2012	2:14 PM	3:57 PM	8:10 AM	2:25 PM	0:11
3/19/2012	2:14 PM	4:49 PM	8:10 AM	2:25 PM	0:11
3/22/2012	2:19 PM	3:59 PM	8:10 AM	2:25 PM	0:06
3/27/2012	2:15 PM	4:02 PM	8:10 AM	2:25 PM	0:10
3/29/2012	1:53 PM	5:30 PM	8:10 AM	2:25 PM	0:32
4/3/2012	2:17 PM	4:07 PM	8:10 AM	2:25 PM	0:08
4/4/2012	2:19 PM	3:41 PM	8:10 AM	2:25 PM	0:06
4/5/2012	2:12 PM	3:29 PM	8:10 AM	2:25 PM	0:13
4/11/2012	2:20 PM	4:10 PM	8:10 AM	2:25 PM	0:05
4/12/2012	2:14 PM	3:29 PM	8:10 AM	2:25 PM	0:11
4/17/2012	2:17 PM	4:02 PM	8:10 AM	2:25 PM	0:08
4/18/2012	2:27 PM	3:44 PM	8:10 AM	2:25 PM	0:00
4/20/2012	NO CLASSES SCHEDULED				0:00
4/24/2012	2:15 PM	4:29 PM	8:10 AM	2:25 PM	0:10
4/25/2012	2:16 PM	3:38 PM	8:10 AM	2:25 PM	0:09
4/30/2012	2:16 PM	4:00 PM	8:10 AM	2:25 PM	0:09
5/1/2012	2:15 PM	3:38 PM	8:10 AM	2:25 PM	0:10
5/3/2012	1:52 PM	3:46 PM	8:10 AM	2:25 PM	0:33
5/7/2012	2:21 PM	4:10 PM	8:10 AM	2:25 PM	0:04
5/8/2012	2:15 PM	3:54 PM	8:10 AM	2:25 PM	0:10
5/10/2012	2:15 PM	3:06 PM	8:10 AM	2:25 PM	0:10
5/14/2012	2:15 PM	4:39 PM	8:10 AM	2:25 PM	0:10
5/16/2012	2:15 PM	4:40 PM	8:10 AM	2:25 PM	0:10

Date	Work Start Time	Work End Time	Class Start Time	Class End Time	Hours Worked w/Class Scheduled Start
5/17/2012	3:00 PM	4:59 PM	8:10 AM	2:25 PM	0:00
5/22/2012	2:17 PM	4:57 PM	8:10 AM	2:25 PM	0:08
5/23/2012	2:17 PM	3:16 PM	8:10 AM	2:25 PM	0:08
5/29/2012	2:13 PM	3:29 PM	8:10 AM	2:25 PM	0:12
5/30/2012	2:12 PM	4:25 PM	8:10 AM	2:25 PM	0:13
6/4/2012	1:27 PM	4:00 PM	8:10 AM	2:25 PM	0:58
6/5/2012	2:13 PM	4:10 PM	8:10 AM	2:25 PM	0:12
6/6/2012	2:13 PM	3:35 PM	8:10 AM	2:25 PM	0:12
6/12/2012	2:15 PM	3:51 PM	8:10 AM	2:25 PM	0:10
6/13/2012	2:17 PM	3:21 PM	8:10 AM	2:25 PM	0:08
6/14/2012	2:15 PM	4:00 PM	8:10 AM	2:25 PM	0:10
6/19/2012	2:08 PM	4:07 PM	8:10 AM	2:25 PM	0:17
6/20/2012	2:07 PM	3:51 PM	8:10 AM	2:25 PM	0:18
6/21/2012	2:11 PM	4:26 PM	8:10 AM	2:25 PM	0:14
6/25/2012	2:10 PM	3:57 PM	8:10 AM	2:25 PM	0:15
6/27/2012	1:30 PM	3:56 PM	8:10 AM	2:25 PM	0:55
TOTAL HOURS WORKED DURING SCHEDULED CLASS					23:39
FWS RATE PER HOUR					\$11.00
TOTAL OWED					\$282.15

Appendix D – Finding 7: Federal Work Study Student #43

School: Fortis College - Mobile

OPEID: 023410

PRCN: 2012-4-04-28049

Date	Work Start Time	Work End Time	Class Start Time	Class End Time	Hours Worked w/Class Scheduled Start
2/7/2012	2:00 PM	5:13 PM	8:10 AM	2:25 PM	0:25
2/13/2012	2:00 PM	5:00 PM	8:10 AM	2:25 PM	0:25
2/14/2012	2:00 PM	6:00 PM	8:10 AM	2:25 PM	0:25
2/15/2012	2:00 PM	4:15 PM	8:10 AM	2:25 PM	0:25
2/16/2012	2:00 PM	6:00 PM	8:10 AM	2:25 PM	0:25
2/21/2012	2:02 PM	5:37 PM	8:10 AM	2:25 PM	0:23
2/22/2012	2:00 PM	4:15 PM	8:10 AM	2:25 PM	0:25
2/23/2012	2:00 PM	5:40 PM	8:10 AM	2:25 PM	0:25
2/24/2012	NO CLASSES SCHEDULED				0:00
2/27/2012	2:00 PM	7:00 PM	8:10 AM	2:25 PM	0:25
2/28/2012	2:00 PM	5:04 PM	8:10 AM	2:25 PM	0:25
2/29/2012	2:00 PM	4:30 PM	8:10 AM	2:25 PM	0:25
3/7/2012	2:00 PM	4:30 PM	8:10 AM	2:25 PM	0:25
3/8/2012	2:00 PM	4:16 PM	8:10 AM	2:25 PM	0:25
3/16/2012	NO CLASSES SCHEDULED				0:00
3/19/2012	2:00 PM	3:00 PM	8:10 AM	2:25 PM	0:25
3/20/2012	2:00 PM	4:51 PM	8:10 AM	2:25 PM	0:25
3/21/2012	2:00 PM	5:00 PM	8:10 AM	2:25 PM	0:25
3/22/2012	1:45 PM	6:00 PM	8:10 AM	2:25 PM	0:40
3/26/2012	2:00 PM	6:00 PM	8:10 AM	2:25 PM	0:25
3/27/2012	2:00 PM	4:45 PM	8:10 AM	2:25 PM	0:25
3/28/2012	2:00 PM	2:23 PM	8:10 AM	2:25 PM	0:25
3/29/2012	2:00 PM	3:38 PM	8:10 AM	2:25 PM	0:25
4/3/2012	2:00 PM	5:00 PM	8:10 AM	2:25 PM	0:25
4/4/2012	2:00 PM	3:00 PM	8:10 AM	2:25 PM	0:25
4/12/2012	2:00 PM	4:30 PM	8:10 AM	2:25 PM	0:25
4/17/2012	2:00 PM	5:17 PM	8:10 AM	2:25 PM	0:25
4/18/2012	2:00 PM	5:00 PM	8:10 AM	2:25 PM	0:25
4/23/2012	2:00 PM	5:30 PM	8:10 AM	2:25 PM	0:25
4/25/2012	2:00 PM	5:30 PM	8:10 AM	2:25 PM	0:25

Date	Work Start Time	Work End Time	Class Start Time	Class End Time	Hours Worked w/Class Scheduled Start
4/26/2012	2:00 PM	3:40 PM	8:10 AM	2:25 PM	0:25
4/30/2012	2:00 PM	5:00 PM	8:10 AM	2:25 PM	0:25
5/1/2012	2:00 PM	5:40 PM	8:10 AM	2:25 PM	0:25
5/2/2012	2:00 PM	5:00 PM	8:10 AM	2:25 PM	0:25
5/16/2012	2:00 PM	7:00 PM	8:10 AM	2:25 PM	0:25
5/17/2012	2:00 PM	5:30 PM	8:10 AM	2:25 PM	0:25
5/18/2012	NO CLASSES SCHEDULED				0:00
5/22/2012	2:08 PM	7:00 PM	8:10 AM	2:25 PM	0:17
5/23/2012	2:04 PM	4:02 PM	8:10 AM	2:25 PM	0:21
5/24/2012	2:01 PM	6:22 PM	8:10 AM	2:25 PM	0:24
5/29/2012	2:00 PM	7:00 PM	8:10 AM	2:25 PM	0:25
5/30/2012	2:00 PM	7:00 PM	8:10 AM	2:25 PM	0:25
5/31/2012	2:00 PM	4:12 PM	8:10 AM	2:25 PM	0:25
6/5/2012	2:08 PM	5:35 PM	8:10 AM	2:25 PM	0:17
6/6/2012	2:06 PM	4:30 PM	8:10 AM	2:25 PM	0:19
TOTAL HOURS WORKED DURING SCHEDULED CLASS					17:16
FWS RATE PER HOUR					\$7.25
TOTAL OWED					\$125.18

Appendix E

Program Review Report



FYI

February 7, 2013

Duncan Anderson, President
Fortis College - Mobile
3590 Pleasant Valley Road
Mobile, AL 36609

UPS Tracking # 1ZA5467Y0193490433

RE: **Program Review Report**
OPE ID: 023410
PRCN: 2012-4-04-28049

Dear Mr. Anderson:

From September 10, 2012 through September 14, 2012, Angelique James conducted a review of Fortis College's (FC) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by FC. The response should include a brief, written narrative for each finding that clearly states FC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, FC must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
 - a. A written statement addressing the institution's response;
 - b. A written statement of the basis for such report or determination; and
 - c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

response will not be attached to the FPRD. However, it will be retained and available for inspection by FC upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Angelique James of this office within 90 calendar days of receipt of this letter.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Angelique James at 404-974-9441 or angelique.james@ed.gov.

Sincerely,

(b)(6); (b)(7)(C)

Chris Miller
Compliance Manager

cc: Felicia Williams, Financial Aid Administrator
Catherine Villarreal, Financial Aid Administrator

Enclosure:
Protection of Personally Identifiable Information

Prepared for

Fortis College - Mobile



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID 023410

PRCN 2012-4-04-28049

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Team - Atlanta

Program Review Report

February 7, 2013

Federal Student Aid, School Participation Division - Atlanta
61 Forsyth Street SW, Room 18F40, Atlanta, GA 30303
www.FederalStudentAid.ed.gov

Federal Student Aid
AN OFFICE of the U.S. DEPARTMENT of EDUCATION

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A. Institutional Information

Fortis College - Mobile
3590 Pleasant Valley Road
Mobile, AL 36609

Type: Proprietary

Highest Level of Offering: Associates Degree

Accrediting Agency: Accrediting Bureau of Health Education Schools

Current Student Enrollment: 1384 (as of 8/27/2012)

% of Students Receiving Title IV: 96% (as of 8/27/2012)

Title IV Participation: Postsecondary Education Participants System (PEPS)

2010-2011 Award Year

Federal Pell Grant Program (Pell)	\$7,832,340
Federal Supplemental Education Opportunity Grant (SEOG)	\$185,480
Federal Work Study (FWS)	\$90,723
William D. Ford Direct Loan Program (Direct Loan)	\$8,484,527

Default Rate FFEL/DL:	2010	6.8%
	2009	7.1%
	2008	4.2%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Fortis College - Mobile (FC) from September 10, 2012 to September 14, 2012. The review was conducted by Angelique James.

The focus of the review was admission requirements. The review consisted of an examination of FC's student files.

A sample of 40 files was identified for review from the 2009, 2010, 2011 and 2012 award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

In addition, 3 files were selected from the 2010 award year based on a news article published in March 2011 which discussed a lawsuit filed in Mobile, Alabama by three former students who stated that Fortis College (Mobile) enrolled them in the cosmetology program in November 2009. The students state that they were enrolled with the promise that Fortis would also provide a high school diploma upon successful completion of their cosmetology program to allow the three women to sit for the state licensing exam. The students completed their program and were given high school diplomas from American Southeast Academy (ASA) only to learn that the State of Alabama did not recognize ASA as a valid high school. Appendix B lists the names and partial social security numbers of the 3 additional students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning FC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve FC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs. This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by FC to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Ineligible High School Diploma

Citation Summary: 34 C.F.R. § 668.32(a)(2)(e)(1) states a student is eligible to receive Title IV, HEA program assistance if the student has a high school diploma or its recognized equivalent.

34 C.F.R. § 668.16(p) states that institutions are required to develop and apply procedures to evaluate the validity of a student's high school diploma if the institution or the Department has reason to believe that the diploma is not valid or was not obtained from an entity that provides secondary school education.

Noncompliance Summary: The Institution's admission policy states "The applicant must provide documentation of graduation from high school or college in the form of a valid high school diploma or higher earned degree, transcript, or other acceptable valid documentation which confirms that the applicant meets or exceeds the academic achievement equivalent to a high school diploma in the USA. All official foreign documents submitted must be translated into English and evaluated to be equivalent or higher than a USA high school diploma".

There were eight students in a sample of 43 that appeared to have an invalid high school diploma from American Southeastern Academy (ASA) and American Worldwide Academy (AWA). Students #12, #13, #14, #16, #18, #19, #21 and #30 were identified as having an invalid high school diploma.

Inspector General (IG) Agent for the Department of Education contacted ASA on December 6, 2010 to inquire about receiving a HS Diploma. The representative from the school stated that individuals interested in a HS Diploma do not take classes. Instead, individuals come to its office, complete an application and receive materials. The High School Diploma exam can be taken the same day that a person applies to ASA, and there are "links" available to take the exam. The charge for the diploma is \$450 and only HS Diplomas are issued and not General Educational Development (GED) certificates.

Student 12: For the 2009-2010 award year, student 12's prospective student profile application indicated that the student graduated from Dixon Educational Center. However, there was a diploma from American Southeastern Academy (ASA) in the file. Student 12 signed the FC enrollment agreement on 10/14/09. The ASA diploma lists the high school graduation date of 10/15/09.

Student 13: For the 2009-2010 award year, student 13's copy of a high school transcript from Jackson High School had a withdrawal date of 6/1/93. However, there was a diploma from American Southeastern Academy (ASA) in the file. Student 13 signed the FC enrollment agreement on

2/15/10. The ASA diploma lists the high school graduation date of 2/16/10. This student was among the 3 students referred from OIG.

- Student 14: For the 2009-2010 award year, student 14's prospective student profile application listed a "blank" for the name of the high school that the student graduated from. This form also indicated that the student received a high school diploma/GED on 5/27/05. However, there was a diploma from American Worldwide Academy (AWA) in the file. Student 14 signed the FC enrollment agreement on 10/2/09. The AWA diploma lists the high school graduation date of 11/20/09.
- Student 16: For the 2009-2010 award year, student 16's copy of a high school transcript from the Mississippi State Board of Education had no graduation data. However, there was a diploma from American Southeastern Academy (ASA) in the file. Student 16 signed the FC enrollment agreement on 11/6/09. The ASA diploma lists the high school graduation date of 11/6/09. This student was among the 3 students referred from OIG.
- Student 18: For the 2009-2010 award year, student 18's prospective student profile application indicated that the student attended Pascagoula High; however, there was a copy of a high school transcript from the Mississippi Permanent School Record with no graduation data in the file.
- Student 19: For the 2009-2010 award year, there was a diploma from American Southeastern Academy (ASA) in the file. Student 19 completed the Free Application for Federal Student Aid (FAFSA) on 2/09/10. The ASA diploma lists the high school graduation date of 2/9/10. This student was among the 3 students referred from OIG.
- Student 21: For the 2009-2010 award year, there was a diploma from American Southeastern Academy (ASA) in the file. Student 21 signed the FC enrollment agreement on 9/08/09. The ASA diploma lists the high school graduation date of 9/10/09.
- Student 30: For the 2009-2010 award year, there was a diploma from American Southeastern Academy (ASA) in the file. Student 30 signed the FC enrollment agreement on 2/25/10. The ASA diploma lists the high school graduation date of 2/22/10.

When asked about the legitimacy of the ASA and AWA high school diplomas, the Financial Aid Director stated that FC stopped accepting these diplomas and all other online diplomas due to suspecting that these were not valid.

Required Action: School officials must provide proof that the students identified above either have a valid high school diploma, GED, or took the ability to benefit test.

Due to the significant error rates based on the sampling of the student files tested for the 2009-2010 award year, FC must determine the extent of non-compliance associated with this finding. The Institution is required to perform a full file review for all 2009-2010 Title IV recipients admitted to the institution with an invalid high school diploma or with discrepant information regarding high school graduation.

The Institution must provide the following information in an Excel Spreadsheet:

- Student Last Name
- Student First Name
- Student SSN
- Award Year (2010)
- High School Diploma (yes/no)
- Name of High School
- Program Type (i.e. PELL, DL Sub, DL Unsub, FWS, etc.)
- Title IV Aid Amount

Submit the results of this review in an electronic Excel spreadsheet. **Return the file to Angelique James by e-mail at Angelique.James@ed.gov within 90 days of receipt of this letter.** This data will contain personally identifiable information and must be emailed as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) must be sent in a separate email.

The institution must engage an Independent Public Accountant (IPA) to test the review completed by the institution. The IPA must also develop a set of procedures designed for testing the accuracy and completeness of the file review. **The suggested procedures must be provided to Angelique James within 30 days of the institution's receipt of the program review report.** Ms. James will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the agreed upon procedures to test the accounting completed by the institution, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all accounting elements as specified in the finding requirement as presented in the program review report. The IPA must prepare the report in accordance with AICPA Attestations Standards. The IPA's report must be submitted with the institution's response to this program review report.

Please mail auditor attestation and any other necessary documents to:

Angelique James
Institutional Review Specialist

U.S. Department of Education
Federal Student Aid
61 Forsyth Street SW
Room 18T40
Atlanta, GA 30303

The institution is also required to implement procedures to ensure the validity of high school diplomas before students are admitted and disbursed Title IV funds. A copy of the procedures should be submitted in response to this report.

Repayment instructions, if any will be addressed in the Final Program Review Determination Letter.

Finding 2. Pell overpayment/underpayment

Citation: 34 C.F.R § 690.75(a)(1) states that for each payment period, a school must pay a Federal Pell Grant to an eligible student only after it determines that the student qualifies as an eligible student under 34 C.F.R. § 668, Subpart C. In addition, 34 C.F.R § 690.63(b) specifically states that Federal Pell Grant payments for a payment period are calculated by determining the student's enrollment status for the term, and determining his or her annual award from the payment schedule for full-time students or the disbursement schedule for three-quarter time, half-time, or less than half-time students, and dividing that amount by three (for institutions using quarters).

Noncompliance: The institution failed to pay the correct annual award from the Pell payment schedule for twelve students in a sample of 43.

Student 2: For the 2008-2009 award year, on 4/1/09, student 2 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 3/23/09 - 5/29/09. The student's estimated family contribution (EFC) was \$0. However, the student was actually a half time student enrolled in 8 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 2 should have received \$788 (\$2,366 divided by 3 semesters) for the term. A Pell refund was done on 4/6/09 for \$1,183; however, this refund was done incorrectly.

Student 5: For the 2008-2009 award year, on 12/1/08, student 5 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 11/24/08 - 2/13/09. The student's estimated family contribution (EFC) was \$0. However, the student was actually a half time student enrolled in 6 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 5 should have received \$788 (\$2,366 divided by 3 semesters) for the term. A Pell refund was done on 1/26/09 for \$788.

- Student 8: For the 2008-2009 award year, on 6/17/09, student 8 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 4/27/09 - 7/3/09. The student's EFC was \$0. However, the student was actually a half time student enrolled 7.5 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 8 should have received \$788 for the term. A Pell refund was done on 7/7/09 for \$788.
- Student 10: For the 2008-2009 award year on 3/25/09, student 10 was given a half time Pell award of \$788 (\$2,366 divided by 3 semesters) for the term 3/23/09 - 5/29/09. Student 10 was given another half time Pell award of \$788 (\$2,366 divided by 3 semesters) for the term 6/1/09 - 8/7/09 on 6/8/08. The student's EFC was \$0. However, the student was actually a three quarter time student enrolled in 10 credit hours for the first semester and a full time student enrolled in 12 credit hours for the second semester. According to the 2008-2009 Pell annual award payment schedule for three-quarter time students, Student 10 should have received \$1,182 for the first term and \$1,576 for the second term. A Pell refund was done on 9/17/09 for \$891; however, this refund was done incorrectly.
- Student 12: For the 2010-2011 award year on 7/27/10, student 12 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/5/10 - 9/10/10. The student's EFC was \$0. However, the student was actually a three quarter time student enrolled in 10 credit hours for the semester. According to the 2010-2011 Pell annual award payment schedule for three-quarter time students, Student 12 should have received \$1,375 for the term. As of yet, a Pell refund has not been done. FC must return \$475 to the Department.
- Student 14: For the 2009-2010 award year on 2/17/10, student 14 was given a full time Pell award of \$1,784 (\$5,350 divided by 3 semesters) for the term 2/15/10 - 4/23/10. The student's EFC was \$0. However, the student was actually a half time student enrolled in 7.5 credit hours for this semester. According to the 2009-2010 Pell annual award payment schedule for half time students, Student 14 should have received \$892 for the term. As of yet, a Pell refund has not been done. FC must return \$892 to the Department.
- Student 25: For the 2011-2012 award year on 8/10/11, student 25 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 8/8/11 - 10/13/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for half time students,

Student 25 should have received \$925 for the term. As of yet, a Pell refund has not been done. FC must return \$925 to the Department.

- Student 28: For the 2011-2012 award year on 7/7/11, student 28 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/5/11 – 9/9/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for half time students, Student 28 should have received \$925 for the term. A Pell refund was done on 8/30/11 for \$1,422; however, this refund was done incorrectly. To correct this issue, a Pell adjustment was done on 3/9/12 for \$497.
- Student 29: For the 2010-2011 award year on 10/20/10, student 29 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 10/18/10 – 1/7/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2010-2011 Pell annual award payment schedule for half time students, Student 29 should have received \$925 for the term. A Pell refund was done on 12/20/10 for \$925.
- Student 32: For the 2010-2011 award year on 7/12/10, student 32 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/6/10 – 9/10/10. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2010-2011 Pell annual award payment schedule for half time students, Student 32 should have received \$925 for the term. A Pell refund was done on 9/9/10 for \$925.
- Student 37: For the 2010-2011 and 2011-2012 award years on 1/24/11, 4/8/11, 8/26/11, 10/7/11 and 1/12/12 student 37 was given a full time Pell award of \$1,834 (\$5,500 divided by 3 semesters) for the January 2011, April 2011, July 2011, October 2011 and January 2012 terms. The student's EFC was \$15 for both award years. However, the student was actually a three quarter time student enrolled in 9 credit hours for the January 2011 semester. Student 37 was a half time student for the April 2011, July 2011 and October 2011 semesters enrolled in 8 credit hours, 7.5 credit hours and 8 credit hours respectively. Student 37 was actually a three quarter time student enrolled in 9 credit hours for the January 2012 semester. According to the 2010-2011 Pell annual award payment schedule for three quarter time students, Student 37 should have received \$1,375 for the January 2011 term and \$916 for the April 2011. According to the 2011-2012 Pell annual award payment schedule for half time students, Student 37 should have received \$916 for the July 2011 and October 2011 terms

and \$1,375 for the January 2012 term. As of yet, a Pell refund has not been done. FC must return \$3,672 to the Department.

Student 41: For the 2011-2012 award year on 9/26/11, student 41 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 09/27/11 – 11/7/11. The student's EFC was \$0. However, the student was actually a three quarter student enrolled in 9 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for three quarter time students, Student 41 should have received \$1,387 for the term. As of yet, a Pell refund has not been done. FC must return \$463 to the Department

Required Action: Due to the significant error rates based on the sampling of the student files tested for the 2008-2009, 2010-2011 and 2011-2012 award years, FC must determine the extent of non-compliance associated with this finding. The Institution is required to perform a full file review for all of the 2008-2009, 2010-2011 and 2011-2012 Federal Pell Grant recipients. File reviews must be performed for all Federal Pell Grant recipients except those included in the Appendix A and Appendix B of this Program Review Report for the respective award years.

The Institution must provide the following information in an Excel Spreadsheet:

- Student Last Name
- Student First Name
- Student SSN (Last 4 digits)
- Award Year
- Program Type (i.e. only PELL)
- Incorrect (Original) Enrollment Status (i.e. Full Time, Three Quarter Time, Half Time, Less than Half Time)
- Incorrect (Original) Number of Semester Hours in Payment Period (student was paid on)
- Correct Enrollment Status (i.e. Full Time, Three Quarter Time, Half Time, Less than Half Time)
- Correct Number of Semester Hours in Payment Period (student should be paid on)
- Original Pell Amount Disbursed (by semester)
- Correct Pell Amount to be Disbursed (by semester)
- Difference of Amount (Original Pell Amount Disbursed – Correct Pell Amount to be Disbursed)
- "Difference of Amount" Already Paid Back to Department (Yes/No)

Submit the results of this review in an electronic Excel spreadsheet. **Return the file to Angelique James by e-mail at Angelique.James@ed.gov within 90 days of receipt of this letter.** This data will contain personally identifiable information and must be emailed as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) must be sent in a separate email.

The institution must engage an Independent Public Accountant (IPA) to test the review completed by the institution. The IPA must also develop a set of procedures designed for testing the accuracy and completeness of the file review. **The suggested procedures must be provided to Angelique James within 30 days of the institution's receipt of the program review report.** Ms. James will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the agreed upon procedures to test the accounting completed by the institution, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all accounting elements as specified in the finding requirement as presented in the program review report. The IPA must prepare the report in accordance with AICPA Attestations Standards. The IPA's report must be submitted with the institution's response to this program review report.

Please mail auditor attestation and any other necessary documents to:

Angelique James
Institutional Review Specialist
U.S. Department of Education
Federal Student Aid
61 Forsyth Street SW
Room 18T40
Atlanta, GA 30303

Along with the file review required for finding 2, FC must develop a policy to ensure Pell overpayment/underpayments do not occur in the future. This policy must detail how the financial aid office will be informed of student status' (full time, three quarter, half time, less than half time) and the methods financial aid will use to determine Pell eligibility and disbursement. A copy of the procedures should be submitted in response to this report.

Repayment instructions, if any will be addressed in the Final Program Review Determination Letter.

Finding 3. Return to Title IV not calculated correctly

Citation: 34 C.F.R § 668.22 states that when a recipient of Title IV grant or loan assistance withdraws from an Institution during a payment period or period of enrollment in which the recipient began attendance, the Institution must determine the correct amount of Title IV grant or loan assistance that the student earned as of the student's withdrawal date. If the total amount of Title IV grant or loan assistance, or both, that the student earned is less than the amount of Title IV grant or loan assistance that was disbursed to the student, the difference between these amounts must be returned to the

Title IV program. If the total amount of Title IV grant or loan assistance, or both, that the student earned is greater than the total amount of Title IV grant or loan assistance, or both, that was disbursed to the student, the difference between these amounts must be treated as a post-withdrawal disbursement. Up through the 60% point in each payment period or period of enrollment, a pro rata schedule is used to determine the amount of Title IV funds the student has earned at the time of withdrawal. After the 60% point in the payment period or period of enrollment, a student has earned 100% of the Title IV funds he or she was scheduled to receive during the period.

Noncompliance: In the sample of 43 students, 5 student's return to Title IV (R2T4) calculations were done incorrectly due to percentage errors of Title IV funds being earned by the student and there was 1 student in which no R2T4 worksheet was in the file.

Student 2: For the 2008-2009 award year, student 2 withdrew on 3/26/09 and a R2T4 calculation was done on 3/31/09. The R2T4 displays a payment period begin date of 3/23/09 and an end date of 5/29/09 with an LDA of 3/26/09. The student completed 4 days of the 68 scheduled days of the payment period which equals to a .0588 percentage of Title IV Aid earned. The R2T4 worksheet uses the incorrect Pell grant net disbursement and does not calculate a return of Title IV funds correctly.

Student 9: For the 2009-2010 award year, student 9 withdrew on 1/08/10 and a R2T4 calculation was done on 1/26/10. The R2T4 displays a payment period begin date of 11/23/09 and an end date of 2/12/10 with an LDA of 1/08/10. The student completed 31 days of the 66 scheduled days of the payment period which equals to a .4697 percentage of Title IV Aid earned. The R2T4 worksheet incorrectly rounds .4697 to 100% and does not calculate a return of Title IV funds.

Student 14: For the 2009-2010 award year, student 14 withdrew on 3/9/10 and a R2T4 calculation was done on 3/25/10. The R2T4 displays a payment period begin date of 2/15/10 and an end date of 4/23/10 with an LDA of 3/9/10. The student completed 23 days of the 68 scheduled days of the payment period which equals to a .3382 percentage of Title IV Aid earned. The R2T4 worksheet incorrectly rounds .3382 to 100% and does not calculate a return of Title IV funds.

Student 19: For the 2010-2011 award year, student 19 withdrew on 10/19/10 and a R2T4 calculation was done on 11/05/10. The R2T4 displays a payment period begin date of 9/13/10 and an end date of 11/15/10 with an LDA of 10/19/10. The actual end date of the term was 11/19/10. The student completed 37 days of the 68 scheduled days of the payment period which equals to a .5441 percentage of Title IV Aid earned. The R2T4 worksheet

displays the payment period end date as 11/15/10 and calculates the wrong percentage of Title IV earned of .5781 percentage. The R2T4 worksheet also incorrectly rounds the .5781 percentage to 100% and does not calculate a return of Title IV funds.

Student 28: For the 2011-2012 award year, student 28 withdrew on 8/19/11 and a there was no R2T4 worksheet in the student's file.

Student 29: For the 2010-2011 award year, student 29 withdrew on 11/18/10 and a R2T4 calculation was done on 12/16/10. The R2T4 displays a payment period begin date of 10/18/10 and an end date of 1/7/11 with an LDA of 11/18/10. The student completed 32 days of the 65 scheduled days of the payment period which equals to a .4923 percentage of Title IV Aid earned. The R2T4 worksheet incorrectly rounds .4923 to 100% and does not calculate a return of Title IV funds.

Required Action: Due to the error rate for this material finding being greater than the established limit (2009-2010 - 2 R2T4 calculation errors out of 6 withdrawn students, 2010-2011 - 2 R2T4 calculation errors out of 5 withdrawn students), the Institution must determine the exact amount of institutional liability associated with this finding. The Institution is required to perform a full 100% file review of all of the Title IV recipients who withdrew during the 2009-2010 and 2010-2011 award years and identify those with refunds. The purpose of this file review is to determine whether other R2T4 calculations were either not performed or calculated incorrectly.

The Institution must provide the following information:

1. Student last name
2. Student first name
3. SSN (last 4 digits)
4. Award Year
5. Program—(Pell, DL-Subsidized, DL-Unsubsidized, FSEOG, etc.)
6. Date of Title IV Funds Disbursed
7. Disbursed Amount
8. Last Date of Attendance
9. Date of Withdrawal
10. Date of Determination
11. Original Return Calculation Amount
12. Revised Return Calculation Amount
13. Amount Already Returned
14. Percentage of Title IV student earned (use decimal point rounded to 3 decimal places)
15. Date School Refunded Funds
16. Statutory Refund Due Date

17. Late Refund (Yes/No)
18. Additional Amount to be Returned, if any

Submit the results of this review in an electronic Excel spreadsheet. **Return the file to Angelique James by e-mail at Angelique.James@ed.gov within 90 days of receipt of this letter.** This data will contain personally identifiable information and must be emailed as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) must be sent in a separate email.

The institution must engage an Independent Public Accountant (IPA) to test the review completed by the institution. The IPA must also develop a set of procedures designed for testing the accuracy and completeness of the file review. **The suggested procedures must be provided to Angelique James within 30 days of the institution's receipt of the program review report.** Ms. James will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the agreed upon procedures to test the accounting completed by the institution, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all accounting elements as specified in the finding requirement as presented in the program review report. The IPA must prepare the report in accordance with AICPA Attestations Standards. The IPA's report must be submitted with the institution's response to this program review report.

Please mail auditor attestation and any other necessary documents to:

Angelique James
Institutional Review Specialist
U.S. Department of Education
Federal Student Aid
61 Forsyth Street SW
Room 18T40
Atlanta, GA 30303

Repayment instructions, if any will be addressed in the Final Program Review Determination Letter

Finding 4. Financial aid packaged incorrectly/full eligibility not awarded

Citation: Pursuant to 34 C.F.R. § 668.165, an institution must notify a student of the amount of funds the student and his or her parent is eligible to receive from each FSA program, and how and when the funds will be disbursed. The notification must be sent before the disbursement is made. If the funds include Direct Loan or FFEL Program funds, the notice must indicate which funds are from subsidized loans and which are from

unsubsidized loans. If Perkins, Stafford or PLUS loan funds are being credited to a student's account, the institution must also notify the student or parent in writing of the following:

- anticipated date and amount of the disbursement;
- student's (or parent's) right to cancel all or part of the loan or disbursement
- procedures and the deadline by which the student (or parent) must notify the school that he or she wishes to cancel the loan or disbursement

If the school obtains affirmative confirmation, the notification must be sent no earlier than 30 days prior, and no later than 30 days after crediting the student's account. If the institution does not obtain affirmative confirmation, the notification must be sent no earlier than 30 days prior and no later than seven days after crediting the student's account.

The Higher Education Act of 1965 addresses the refusal or adjustment of loans. Section 479A(c) states the following:

"On a case-by-case basis, an eligible institution may refuse to certify a statement that permits a student to receive a loan under part B or D, or may certify a loan amount or make a loan that is less than the student's determination of need (as determined under this part), if the reason for the action is documented and provided in written form to the student. No eligible institution shall discriminate against any borrower or applicant in obtaining a loan on the basis of race, national origin, religion, sex, marital status, age, or disability status."

Similarly, 34 C.F.R. § 682.603 states that a school may refuse to certify a Stafford or PLUS loan or may reduce the borrower's determination of need for the loan if the reason for that action is documented and provided to the borrower in writing, provided that the determination is made on a case-by-case basis; and the documentation supporting the determination is retained in the student's file.

Schools do not have the authority to limit the amount of Title IV aid that an individual student may receive on a categorical basis. In addition to this, the school may not limit a student's and or parent's FFEL loan borrowing to the amounts needed to cover only institutional costs, or to a certain percentage of direct costs and/ or indirect costs if borrowers would qualify for additional loan funds.

Noncompliance: FC categorically limited the amount of funds that Title IV recipients were eligible to receive in the form of FFEL and/ or Direct Loans. Students were awarded, in most cases, up to direct costs, rather than the Cost of Attendance (COA). Additionally, FC failed to provide adequate financial aid counseling to students which resulted in students not being made aware of their full loan amount for which they were

eligible to receive. The student's award letters did not display student's full eligibility of direct loans.

In the sample of 43 students, only 3 students received their maximum eligibility of unsubsidized loans (student #7, #28, #36). According to financial aid staff, prior to March 2011, to receive full direct loan eligibility students were required to participate in a loan counseling procedure for supplemental borrowing. This loan counseling procedure was required for student's that wanted to increase their level of borrowing. This loan counseling procedure was required even though the students had not reached their full direct loan eligibility. This loan counseling required the student to take written exercises and provide a signed and dated written notice to the financial aid officer of the additional amount that the student is requesting. The student was also required to fill out and submit a "loan request for allowable cost expenses" worksheet which required the student to submit the detailed reason for the request, the circumstances that had changed to create the need for additional funds, a listing of the specific amount requested by line item and a monthly budget. The student was also required to fill out and submit a loan request for allowable cost/expenses income reduction worksheet which required the student to give tax information for the last 3 years.

In our sample, there were 2 students (student #39, #42) in which this loan counseling documentation was found in the financial aid file. According to a financial aid staff member, this loan counseling procedure is no longer mandatory as of March 2011 and is now optional for students but is strongly encouraged by the college. FC's financial aid loan counseling and loan packaging procedures dated 3/31/11 state that the loan counseling procedure is optional.

Required Action: FC must notify all Title IV recipients of the full amount he or she is eligible to receive, and how and when those funds will be disbursed. Students must be made aware of all eligible direct loans funds and have the right to cancel all or part of the loan or disbursement.

Additionally, FC must develop policies and procedures for ensuring that students are counseled and notified of the total amount of Title IV aid they are eligible to receive, and how and when that amount will be paid. The notification must permit the student to accept, reject, or reduce the amount of the loan. A copy of the notification of disbursement, and the new policies and procedures must be submitted to this office in response to this finding.

Finding 5. Federal Work Study Violations-Improper Payment to students

Citation: Pursuant to 34 C.F.R. § 675.16, the institution must make direct Federal Work Study (FWS) payments to students and handle the return of FWS funds that are not received or negotiated by a student. Regardless of who employs the student, the

institution is responsible for ensuring that the student is paid for work performed. A student's FWS compensation is earned when the student performs the work.

Noncompliance: The institution failed to monitor FWS time sheets adequately. Time sheet hours did not correspond to the hours on the paystub for the following students:

Student 10: For the 2008-2009 award year, according to the pay stub for the period 04/1/2009 to 4/15/2009, student 10 was paid for 55 hours at a rate of \$9.00 per hour. However, according to the student's payroll time sheet, for the week of 04/1/2009 to 4/15/2009, student 10 worked 45 hours.

Student 23: For the 2009-2010 award year, student 23's FWS time sheet was missing from the file. An email was written on 6/24/10 indicating that student 23 worked for 32 hours from 6/9/10 to 6/22/10. This email requested to add the FWS hours manually.

Student 42: For the 2011-2012 award year, according to the pay stub for the period 10/8/11 to 10/22/11, student 42 was paid for 12 hours at a rate of \$11.00 per hour. However, according to the student's payroll time sheet, for the week of 10/8/11 to 10/22/11, student 42 worked 10.77 hours but was paid for 12 hours.

Required Action: In its response, FC must provide documentation of the student's payment of federal work study.

FC must also prepare federal work study procedures on how to address monitoring FWS time sheets. These procedures must include financial aid's role in FWS monitoring of timesheets and disbursement of funds. This policy must also address how such errors as the ones listed above will be handled if identified in the future. A copy of these new procedures must be submitted to this office in response to this finding.

Finding 6. Federal Work Study Job Description Incomplete

Citation: 2011-2012 FSA Handbook Volume 6, 6-18. A federal work study position should have a job description that includes the following:

- Name and address of the student's employer (department, public agency, nonprofit organization)
- Purpose of the student's job
- Student's duties and responsibilities
- Job qualifications
- Job's wage rate or range
- Length of the student's employment (beginning and ending dates)
- Name of the student's supervisor

Noncompliance: The institution did not have specific work study job descriptions for each position as illustrated below:

- Student 7: For the 2008-2009 award year, the job description in Student 7's file is missing the address of the student's employer, the purpose of the student's job, the job's wage rate or range, the length of the student's employment and the name of the student's supervisor.
- Student 10: For the 2008-2009 award year, the job description in Student 10's file is missing the address of the student's employer, the purpose of the student's job, the job's wage rate or range, the length of the student's employment and the name of the student's supervisor.
- Student 22: For the 2009-2010 award year, the job description in Student 22's file is missing the address of the student's employer, the purpose of the student's job, the job's wage rate or range, the length of the student's employment and the name of the student's supervisor.
- Student 23: For the 2009-2010 award year, the job description in Student 23's file is missing the purpose of the student's job, the job's wage rate or range, the length of the student's employment and the name of the student's supervisor.
- Student 42: For the 2011-2012 award year, the job description in Student 42's file is missing the address of the student's employer, the purpose of the student's job, the job's wage rate or range, the length of the student's employment and the name of the student's supervisor.
- Student 43: For the 2011-2012 award year, the job description in Student 43's file is missing the address of the student's employer, the purpose of the student's job, the job's wage rate or range, the length of the student's employment and the name of the student's supervisor.

Required Action: In its response, FC must provide updated job descriptions for the students listed above. FC must also update its federal work study procedures for creating job descriptions for work study students according to 2011-2012 FSA Handbook Volume 6, 6-18. A copy of these revised job descriptions must be submitted to this office in response to this finding.

Finding 7. Federal Work Study Violations-Student Working during class hours

Citation: Pursuant to 34 C.F.R. § 675.16, Federal Work-Study Program, an institution must pay a student FWS compensation at least once a month. It is the school's responsibility to

monitor the FWS program. Students may not be scheduled for work and miss class time to perform FWS jobs.

Noncompliance: The institution failed to monitor FWS time sheets adequately. FWS students performed FWS jobs while scheduled for class as illustrated below:

- Student #7 For the 2008-2009 award year, student #7 worked FWS hours during the same period classes were scheduled. A review of the payroll time sheet on 4/16/09 indicates that the student worked from 12:00PM to 5:30PM. According to the enrollment agreement, the student's class schedule was Monday to Thursday from 8:10AM to 2:25PM. According to the student's timesheet and pay schedule, the student was paid \$24.10 for hours worked while also scheduled for class (\$10.00 per hour @2.41 hours=\$24.10).
- Student #10 For the 2008-2009 award year, student #10 worked FWS hours during the same period classes were scheduled. A review of the payroll time sheet on 5/21/09, 5/26/09, 5/27/09 and 5/28/09 indicates that the student worked from 2:15PM to 9:15PM on 5/21/09, 2:15PM to 6:15PM on 5/26/09, 2:15PM to 6:15PM on 5/27/09 and 2:15PM to 6:15PM on 5/28/09. According to the enrollment agreement, the student's class schedule was Monday to Thursday from 5:50PM to 9:50PM. According to the student's timesheet and pay schedule, the student was paid \$41.94 for hours worked while also scheduled for class (\$9.00 per hour @4.66 hours=\$41.94).
- Student #33 For the 2010-2011 award year, student #33 worked FWS hours during the same period classes were scheduled (Appendix C). According to the enrollment agreement, the student's class schedule was Monday to Thursday from 8:10AM to 2:25PM.
- Student #42 For the 2011-2012 award year, student #42 worked FWS hours during the same period classes were scheduled. According to the enrollment agreement, the student's class schedule was Monday to Thursday from 8:10AM to 2:25PM.
- Student #43 For the 2011-2012 award year, student #43 worked FWS hours during the same period classes were scheduled. The student's class schedule was Monday to Thursday from 8:10AM to 2:25PM.

Required Action: In its response, FC must provide documentation that students listed above were not scheduled for classes while working a FWS job.

Due to the significant error rates (2008-2009 - 2 FWS errors out of 2 FWS students; 2011-2012 - 2 FWS errors out of 2 FWS students) based on the sampling of the student

files tested for the award years, FC must determine the extent of non-compliance associated with this finding. The Institution is required to perform a full file review for all of the 2008-2009 and 2011-2012 Federal Work Study recipients. File reviews must be performed for all Federal Work Study recipients except those included in the Appendix A of this Program Review Report for the respective award years.

FC must create a spreadsheet similar to the one created for student #33 (Appendix C) to determine the amount of FWS hours worked during class hours for each of the students listed above for the corresponding award years.

Submit the results of this review in an electronic Excel spreadsheet. **Return the file to Angelique James by e-mail at Angelique.James@ed.gov within 90 days of receipt of this letter.** This data will contain personally identifiable information and must be emailed as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) must be sent in a separate email.

The institution must engage an Independent Public Accountant (IPA) to test the review completed by the institution. The IPA must also develop a set of procedures designed for testing the accuracy and completeness of the file review. **The suggested procedures must be provided to Angelique James within 30 days of the institution's receipt of the program review report.** Ms. James will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the agreed upon procedures to test the accounting completed by the institution, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all accounting elements as specified in the finding requirement as presented in the program review report. The IPA must prepare the report in accordance with AICPA Attestations Standards. The IPA's report must be submitted with the institution's response to this program review report.

Please mail auditor attestation and any other necessary documents to:

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Institutional Review Specialist
U.S. Department of Education
Federal Student Aid
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Room 18T40
Atlanta, GA 30303

Along with the file review required for finding 7, FC must develop a policy to ensure FWS students are not working during scheduled class times. This policy must detail how the financial aid office will be informed of student class schedules and the methods

financial aid will use to determine if students are working during class hours. A copy of the procedures should be submitted in response to this report.

Repayment instructions, if any will be addressed in the Final Program Review Determination Letter.

Finding 8. Exit Counseling not documented

Citation: 34 C.F.R. § 682.604 (g) states that an Institution must ensure that exit counseling is conducted with each Stafford loan borrower either in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that this counseling is conducted shortly before the student borrower ceases at least half-time study at the school, and that an individual with expertise in the title IV programs is reasonably available shortly after the counseling to answer the student borrower's questions. If a student borrower withdraws from school without the school's prior knowledge or fails to complete an exit counseling session as required, the school must ensure that exit counseling is provided through either interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after learning that the student borrower has withdrawn from school or failed to complete the exit counseling as required.

Noncompliance: There was no exit counseling documentation in the file for student #5 for the 2008/2009 award year.

Required Action: The institution must submit the exit documentation to the Department for the student above.

Finding 9. Consumer Information not disclosed

Citation: 34 C.F.R. § 668.41- 48 states that a school must provide a notice containing a list of the consumer information disseminated, and the procedures for obtaining this consumer information to enrolled students on a yearly basis. Schools must also provide a notice (though not an individual notice) of student rights under the Family Educational Rights and Privacy Act (FERPA).

Noncompliance: For the 2011-2012 award year, student #36's file contained a medical x-ray technology program disclaimer form. This form stated that if the student completed the medical x-ray technology program and obtained any necessary post-graduation certificates, the student would be qualified to obtain a position as a limited scope x-ray technician, medical assistant or medical office assistant in facilities such as urgent care centers or doctor's offices. The disclaimer further stated that the medical x-ray technology program would not train the student to perform the breadth of procedures performed by full scope radiologic technologists and the student would not be able to obtain a position as a full scope radiologist technologist.

This form, along with the enrollment agreement was signed on 10/17/2011. When questioned about why this form was only in one student's file, the staff stated that this form was only required for all medical x-ray technology students. The staff stated that this disclaimer was designed to assist medical x-ray technology student's understanding of job opportunities available after graduating from this program. When asked why this description of job opportunities for medical x-ray technology students was not included in FC's catalog or handbook, the staff mentioned that they were not aware that this information needed to be disclosed to all students due to the fact that the disclaimer form was given to all medical x-ray technology students prior to enrollment

Required Action: The institution must make this consumer information on the disclaimer form for medical x-ray technology students available to all students at the institution via catalog, student handbook, etc. This consumer information must be published so that all students can have access. Once this is revised, FC must submit the updates (catalog, student handbook, etc.) to the Department.

Finding 10. Conflicting Information

Citation: 34 C.F.R 668.16(b)(3) and (f) (f) states that an institution must develop and apply an adequate system to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for financial aid under Title IV, HEA programs. In determining whether the institution's system is adequate, the Secretary considers whether the institution obtains and reviews— (1) All student aid applications, need analysis documents, Statements of Educational Purpose, Statements of Registration Status, and eligibility notification documents presented by or on behalf of each applicant; (2) Any documents, including any copies of State and Federal income tax returns, that are normally collected by the institution to verify information received from the student or other sources; and (3) Any other information normally available to the institution regarding a student's citizenship, previous educational experience, documentation of the student's social security number, or other factors relating to the student's eligibility for funds under the Title IV, HEA programs.

Noncompliance: For the 2009/2010 award year, student #22's institutional student information record (ISIR) states that the number of family members in the household is 1; however, there is a statement in the student's file dated 2/4/10 from the student's mother that states student #22 lives in the same household with her mother. The student received \$3,567 in Pell, \$2,920 in Direct Loans and \$385 in FWS.

Required Action: The institution must submit documentation to the Department to resolve this conflict for the student above.

Finding 11. Student not Notified of Refund to Lender

Citation: 34 C.F.R. § 682.607 states that by applying for a direct loan, a borrower authorizes the school to pay directly to the lender that portion of a refund or return of Title IV, HEA program funds from the school that is allocable to the loan upon the borrower's withdrawal. A school must pay that portion of the student's refund or return of Title IV, HEA program funds that are allocable to a FFEL loan to the original lender; or a subsequent holder, if the loan has been transferred to a new holder.

The school must provide simultaneous written notice to the borrower if the school makes a payment of a refund or a return of Title IV, HEA program funds to the lender on behalf of that student.

Noncompliance: FC has procedures in place to notify the borrower if the school makes a payment of a refund or a return of Title IV, HEA program funds to the lender on behalf of that student. FC submitted a copy of the "generating refund notification letters" form which details the refund and stipend letter process performed by the financial aid student services staff and the education affiliates corporate office. According to these procedures, FC mails lender notification letters to students; however, there were no copies of these letters in the files for students #16, #25, #32, and #37.

Required Action: The Institution's response must provide a copy of the refund letters for the student's listed above or develop a policy for retaining such documentation.

E. Appendices

Appendix A - Student Sample #1

School: Fortis College - Mobile
OPEID: 023410
PRCN: 2012-4-04-28049

Student #	Award Year	SSN last 4#	Last Name	First Name	Campus
1	2008/2009	(b)(6); (b)(7)(C)			Pensacola
2	2008/2009				Montgomery
3	2008/2009				Montgomery
4	2008/2009				Mobile
5	2008/2009				Montgomery
6	2008/2009				Mobile
7	2008/2009				Mobile
8	2008/2009				School of Cosmetology
9	2008/2009				Mobile
10	2008/2009				Montgomery
11	2009/2010				Montgomery
12	2009/2010				Pensacola
14	2009/2010				Pensacola
15	2009/2010				Mobile
17	2009/2010				Montgomery
18	2009/2010				Mobile
20	2009/2010				Pensacola
21	2009/2010				School of Cosmetology
22	2009/2010				Montgomery
23	2009/2010				Mobile
24	2010/2011				Pensacola
25	2010/2011				Mobile
26	2010/2011				Mobile
27	2010/2011				Pensacola
28	2010/2011				Mobile
29	2010/2011				Montgomery
30	2010/2011				School of Cosmetology
31	2010/2011				Pensacola
32	2010/2011				Montgomery
33	2010/2011				Mobile
34	2011/2012				School of Cosmetology

Student #	Award Year	SSN last 4#	Last Name	First Name	Campus
35	2011/2012	(b)(6); (b)(7)(C)			Montgomery Nursing
36	2011/2012				Mobile
37	2011/2012				Pensacola
38	2011/2012				Pensacola
39	2011/2012				Montgomery
40	2011/2012				Montgomery
41	2011/2012				Montgomery Nursing
42	2011/2012				Mobile
43	2011/2012				Montgomery

Confidential - This document contains personally identifiable information

Fortis College - Mobile
OPE ID 023410
PRCN 2012-4-04-28049
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Appendix B - Student Sample #2
School: Fortis College - Mobile
OPEID: 023410
PRCN: 2012-4-04-28049

Student #	Award Year	SSN Last 4#	Last Name	First Name	Campus
13	2009/2010	(b)(6); (b)(7)(C)			School of Cosmetology
16	2009/2010				School of Cosmetology
19	2009/2010				School of Cosmetology

Confidential - This document contains Personally Identifiable Information

Appendix C – Finding 8: Federal Work Study Student #33

School: Fortis College - Mobile

OPEID: 023410

PRCN: 2012-4-04-28049

Date	Hours Worked	Hours Scheduled for Class	Hours Worked w/Class Scheduled
3/1/10	2:00PM to 5:00PM	8:10AM to 2:25PM	.42
3/2/10	2:00PM to 5:00PM	8:10AM to 2:25PM	.42
3/4/10	2:00PM to 3:00PM	8:10AM to 2:25PM	.42
4/13/10	2:00PM to 5:00PM	8:10AM to 2:25PM	.42
4/14/10	2:07PM to 4:26PM	8:10AM to 2:25PM	.30
4/15/10	2:09PM to 4:00PM	8:10AM to 2:25PM	.27
4/19/10	2:11PM to 5:00PM	8:10AM to 2:25PM	.23
4/20/10	2:23PM to 5:17PM	8:10AM to 2:25PM	.03
4/21/10	2:17PM to 4:16PM	8:10AM to 2:25PM	.13
4/22/10	12:26PM to 2:48PM	8:10AM to 2:25PM	.2
4/26/10	2:17PM to 5:15PM	8:10AM to 2:25PM	.13
4/27/10	2:21PM to 5:20PM	8:10AM to 2:25PM	.07
4/28/10	2:15PM to 4:21PM	8:10AM to 2:25PM	.17
4/29/10	2:13PM to 4:32PM	8:10AM to 2:25PM	.20
5/3/10	2:17PM to 5:21PM	8:10AM to 2:25PM	.13
5/5/10	11:21AM to 12:26PM 2:19PM to 5:34PM	8:10AM to 2:25PM	1.18
5/6/10	2:17PM to 4:44PM	8:10AM to 2:25PM	.13
5/11/10	2:19PM to 5:25PM	8:10AM to 2:25PM	.10
5/12/10	2:19PM to 4:37PM	8:10AM to 2:25PM	.10
5/17/10	2:17PM to 5:29PM	8:10AM to 2:25PM	.13
5/18/10	2:14PM to 5:31PM	8:10AM to 2:25PM	.18
5/19/10	2:22PM to 5:35PM	8:10AM to 2:25PM	.05
5/24/10	2:19PM to 5:19PM	8:10AM to 2:25PM	.10
5/27/10	12:17PM to 2:22PM	8:10AM to 2:25PM	2.13
6/1/10	2:17PM to 5:47PM	8:10AM to 2:25PM	.13
6/2/10	2:06PM to 5:49PM	8:10AM to 2:25PM	.32
6/3/10	2:15PM to 5:22PM	8:10AM to 2:25PM	.17
6/7/10	2:15PM to 6:28PM	8:10AM to 2:25PM	.17
6/8/10	2:07PM to 6:54PM	8:10AM to 2:25PM	.30
6/9/10	2:20PM to 6:48PM	8:10AM to 2:25PM	.08
6/10/10	2:17PM to 3:16PM	8:10AM to 2:25PM	.13
6/14/10	2:18PM to 5:29PM	8:10AM to 2:25PM	.12

Date	Hours Worked	Hours Scheduled for Class	Hours Worked w/Class Scheduled
6/15/10	2:10Pm to 6:00PM	8:10AM to 2:25PM	.25
6/16/10	2:10PM to 6:16PM	8:10AM to 2:25PM	.25
TOTAL HOURS WORKED DURING CLASS SCHEDULE			11.36

Appendix F

Institution's Letter - Finding 2 & 3



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April 3, 2013

Ms. Angelique James
Institutional Review Specialist
U.S. Department of Education
Federal Student Aid
61 Forsyth Street, Suite 18T40
Atlanta, Georgia 30303-3104

OPE ID: 02341000
PRCN: 2012-4-04-28049

Dear Ms. James:

We are in receipt of Mr. Chris Miller's letter of February 7, 2013 which included the report of the Department's (ED) review of Fortis College's administration of the Title IV programs conducted September 10, 2012 to September 14, 2012. In his letter, Mr. Miller requested that we address our questions concerning the report to you.

We have completed a preliminary review of the report, and we have questions regarding finding numbers two and three in the report. We respectfully request that you review the summary below for each of the instances of noncompliance identified in the Department's Program Review Report related to findings two and three. We believe that if you concur with our conclusions there may not be a need to perform the file reviews and attestations required for these findings.

Finding 2: Pell Overpayment / Underpayment

As a matter of background, Fortis College is an institution whose programs of study are organized into standard ten-week or twelve-week quarters. Each quarter has two five-week or two six-week modules. The College offers credit hour programs at the degree level as well as diploma programs that fully matriculate into the degree level programs and programs at the diploma level that do not fully matriculate into a degree program. With the exception of the one student identified in this finding as being enrolled in a the Associate Degree in Nursing, all of the students identified in this finding were enrolled in programs that were subject to the Department's clock to credit hour conversion formula (previously 20 clock hours of instruction to one FA quarter credit hour and currently 25 clock hours of instruction, including no more than five hours of outside preparation, to one FA quarter credit hour). Students register for courses each quarter based on their academic plan. All students, except certain students with transfer credit or students

required to repeat a prerequisite course, attend full time in the day division (12 or more FA quarter credit hours) and half time in the evening division (6 to 8 FA quarter credit hours). The only exception for evening students is for their final ten-week or twelve-week quarter. In this final quarter, students generally qualify for a full time Pell Grant because the total FA credits for their final quarter are 12 or more quarter credit hours.

The College schedules each student with a standard course registration for the full ten-week or twelve-week quarter. The College bills tuition every quarter and awards and disburses all Federal financial aid for the full ten-week or twelve-week quarter based on the student's course registration for the entire quarter. If a student withdraws during the quarter before all registered courses are attempted, the College recalculates the students' Pell Grant eligibility in accordance with 34 CFR 690.80(b) (2)(ii). Prior to July 1, 2011, the College also followed the guidance provided by the Department in DCL GEN-00-24 which stated that if a student completed at least one module in a quarter, the student was not considered to have withdrawn from the institution even if the student did not begin a subsequent module in the same quarter, and therefore, no Return of Title IV funds calculation was completed. This guidance can be found under the section of DCL GEN-00-24 titled "Withdrawals from standard quarter-based programs using modules, Q4. How are the Return of Title IV Aid requirements applied when a student withdraws from a standard quarter-based program comprised of a series of modules?" The DCL states as follows:

PRINCIPLE #1

If a student withdraws from an institution after completing at least one course in one module within the quarter, the student is not considered to have withdrawn and the requirements of §668.22 for the Return of Title IV Aid do not apply. However, other regulatory provisions concerning recalculation may apply.

For example, if a student completes a course in the first module and then withdraws after two weeks of attendance in the second module, the student is not considered to have withdrawn. This principle is based on the concept that at a traditional quarter-based institution where a student takes courses concurrently, if the student completes at least one course but drops all others, that student would not be considered to have withdrawn. Other Title IV provisions may apply, such as the requirement under the Federal Pell Grant Program to recalculate the Pell Grant award.

We attach for your convenience a copy of DCL GEN-00-24, with the relevant sections highlighted. Consistent with the Department's revised regulations effective July 1, 2011, the College has since July 1, 2011 treated a student as a withdrawal for Title IV purposes if the student ceases attendance at any point prior to completing all of the days in the payment period that the student was scheduled to complete. See 34 CFR 668.22(a)(2)(i)(A).

In addition, when awarding and disbursing federal financial aid to students at the beginning of a quarter, the College routinely considers the student's enrollment status for the complete quarter. In some cases, the program review report assumes that the College overawarded Title IV funds because the student dropped from the program without starting all of the courses offered during the quarter under the modular format, and as a result, the student's enrollment status was reduced and a Pell recalculation was performed based on the actual number of credit hours attempted. The College was correct to initially determine the student's award based on the student's enrollment status at the start of the quarter. The College could not have known in advance that the student would withdraw without attempting all of the credits in which the student was enrolled for the quarter.

When the above principals are applied, there are only two errors remaining out of the twelve original cited errors for this finding, and only 2 out of 44 in the sample. Each of the two remaining errors is based on an erroneous recalculation of the withdrawn student's Pell Grant and not based on a failure to perform a required Return of Title IV funds calculation. We respectfully request that in the context of DCL GEN-00-24 and the specific information provided below for each of the cited instances of Pell Grant overaward or underaward identified in finding number two that the Department reconsider its required corrective action for this finding.

Student 2: For the 2008-2009 award year, on 4/1/09, student 2 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 3/23/09 - 5/29/09. The student's estimated family contribution (EFC) was \$0. However, the student was actually a half time student enrolled in 8 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 2 should have received \$788 (\$2,366 divided by 3 semesters) for the term. A Pell refund was done on 4/6/09 for \$1,183; however, this refund was done incorrectly.

Response:

Student 2, (b)(6); (b)(7)(C) was enrolled in a Medical Assistant diploma program as a full time student. Her first academic year consisted of three standard ten-week quarters (i.e., not semesters per the program review report). She began her fourth quarter on 3/23/09 enrolled as a ¾ time student. This student deviated from the normal schedule because of a change in her program of study which took place starting with her November 24, 2008 Module. The student officially withdrew from the College on 3/31/09. The College had incorrectly disbursed a full time Pell Grant on 4/1/09. The error was identified immediately and corrected during the Pell recalculation on 4/6/09. The student had attempted one course, "Simulating the Medical Office" a 2 FA quarter credit course. An accurate and timely Pell recalculation and an R2T4 were completed. The Pell recalculation correctly reduced the Pell to the less-than-half time

amount of \$394. The R2T4 portion of the refund correctly refunded the percentage of the Pell unearned by the student. The total Pell Recalculation and R2T4 Pell refund of \$1,554 was completed on 4/6/09. The college recognizes that the initial full time Pell Grant disbursement was in error, but the ineligible portion was refunded with the Pell recalculation within 5 days of the disbursement, so there was no over/under payment of the student's Pell Grant.

The following are the names of the courses in (b)(6); (b)(7)(C) was registered for in her fourth quarter based on the academic plan for her program of study and the fact that she started her program on April 28, 2008:

Course Name	MOD	Attempted	Completed	Grade	FA Credit Hours
Simulating the Medical Office	1	Yes	No	W	2
Health Assessment Techniques	1	No	No	None	2
Body Systems	1	No	No	None	2
Examination Room Techniques	2	No	No	None	2
Extern Seminar	2	No	No	None	1
Total Credits for the Quarter					9

Based on this course registration her second quarter, the student's enrollment status was ¾ time for Pell Grant purposes, (b)(6); (b)(7)(C) Pell Grant was correctly recalculated, and all necessary refunds were made to her account. (b)(6); (b)(7)(C) officially withdrew effective 2/17/09. (b)(6); (b)(7)(C) returned to her program 4/27/09 and continued her program with the same anticipated course progression as described above. (See attached student #2 transcript, student #2 ledger, (b)(6); (b)(7)(C) R2T4 04-06-09.)

In summary for Student 2, the 2008-2009 award year Pell Grant disbursement for the student's quarter starting on 3/23/09 was erroneously based on a full-time enrollment status but was corrected within 5 days of the disbursement. Her combined Pell Grant recalculation and R2T4 refund was \$1,544 and was completed on 4/6/09 assuming her actual ¾ time enrollment. The student's refund computations have been reviewed and they are correct. The Pell Grant refund also appears to be both accurate and timely. Student 2 was neither overawarded nor underawarded her 2008-2009 award year Pell Grant.

Student 5: For the 2008-2009 award year, on 12/1/08, student 5 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 11/24/08 – 2/13/09. The student's estimated family contribution (EFC) was \$0. However, the student was actually a half time student enrolled in 6 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 5 should have received \$788 (\$2,366 divided by 3 semesters) for the term. A Pell refund was done on 1/26/09 for \$788.

Response:

Student 5, (b)(6); (b)(7)(C) was enrolled in a Medical Office Specialist diploma program as a full-time student. She started her first quarter (i.e., not semester) on 11/24/08 and was enrolled on a full-time basis. (b)(6); (b)(7)(C) was properly disbursed a full-time Pell grant on 12/1/08. On 1/14/09, (b)(6); (b)(7)(C) unofficially withdrew from classes after completing her first module (6 FA credits). She did not attempt any courses in the second module of her first quarter. Because (b)(6); (b)(7)(C) completed at least one course and a total for six credit hours for the quarter (Principles of Medical Insurance, 2 FA credit hours, Examination Room Techniques, 2 FA credit hours, and Basic Keyboarding, also 2 FA credit hours), the College was not required to perform a Return of Title IV funds calculation. Instead, the College performed a Pell Grant recalculation. The Pell Grant recalculation was correctly made, and the required refund of \$788 was performed on 1/26/09. There was no Pell Grant over/under award.

The following are the names of the courses (b)(6); (b)(7)(C) was registered for in her first quarter based on the academic plan for her program of study and the fact that she started her program on November 24, 2008:

Course Name	MOD	Attempted	Completed	Grade	FA Credit Hours
Basic Keyboarding	1	Yes	Yes	F	2
Examination Room Techniques	1	Yes	Yes	F	2
Principles of Medical Insurance	1	Yes	Yes	F	2
Communication	2	No	No	None	1
Introduction to Anatomy	2	No	No	None	2
Medical Law and Ethics	2	No	No	None	1
Psychology for Success	2	No	No	None	2
Total Credits for the Quarter					12

Based on this course registration her second quarter, the student's enrollment status was full time for Pell Grant purposes, (b)(6); (b)(7)(C) was correctly awarded and disbursed a full-time Pell Grant for the quarter of \$1,577. (b)(6); (b)(7)(C) unofficially withdrew effective 1/14/09. Further evidence of (b)(6); (b)(7)(C) full time enrollment status is provided in the attached screen shot from the FAME system. The screen shot documents the credit hour basis of (b)(6); (b)(7)(C) full time Pell Grant disbursement for the quarter. (See attached Exhibit A Student # 5, student #5 ledger, student #5 transcript.)

In summary for Student 5, the 2008-2009 award year Pell Grant disbursement for the student's quarter starting on 11/24/08 was based on her full-time enrollment status at the beginning of the quarter (12 credit hours). The student withdrew 1/14/09 after completing 6 FA quarter credits. A timely and accurate Pell Recalculation was completed on 1/26/09. Student 5 was neither overawarded nor underawarded her 2008-2009 award year Pell Grant. Further, no R2T4 was required under the rules applicable at the time.

Student 8: For the 2008-2009 award year, on 6/17/09, student 8 was given a full time Pell award of \$1,577 (\$4,731 divided by 3 semesters) for the term 4/27/09 - 7/3/09. The student's EFC was \$0. However, the student was actually a half time student enrolled 7.5 credit hours for the semester. According to the 2008-2009 Pell annual award payment schedule for half time students, Student 8 should have received \$788 for the term. A Pell refund was done on 7/7/09 for \$788.

Response:

Student 8, (b)(6); (b)(7)(C) was enrolled in a Cosmetology program as a full-time student. She started her first quarter on 4/27/09 and was enrolled on a full-time basis. (b)(6); (b)(7)(C) was properly disbursed a full-time Pell Grant on 6/17/09. On 7/2/09, (b)(6); (b)(7)(C) withdrew from classes after completing her first module (7.5 FA credits). She did not attempt any courses in the second module of her first quarter. Because (b)(6); (b)(7)(C) completed at least one course for the quarter (Fundamentals of Cosmetology, 7.5 FA credit hours), the College was not required to perform a Return of Title IV funds calculation. Instead, the College performed a Pell Grant recalculation. The Pell Grant recalculation was correctly made, and the required refund of \$788 was performed on 7/7/09. There was no Pell Grant over/under award.

The following are the names of the courses (b)(6); (b)(7)(C) was registered for in her first quarter based on the academic plan for her program of study and the fact that she started her program on April 27, 2009:

Course Name	MOD	Attempted	Completed	Grade	FA Credit Hours
Fundamentals of Cosmetology	1	Yes	Yes	A	7.5
Fundamentals of Haircutting	2	No	No	None	7.5
Total Credits for the Quarter					15

Based on this course registration for her second quarter, the student's enrollment status was full time for Pell Grant purposes, Ms. Horton was correctly awarded and disbursed a full-time Pell Grant for the quarter of \$1,577. (b)(6); (b)(7)(C) unofficially withdrew effective 5/29/09.

Documentation of (b)(6); (b)(7)(C) full time enrollment status is provided in the attached screen shot from the FAME system. The screen shot documents the credit hour basis of (b)(6); (b)(7)(C) full time Pell Grant disbursement for the quarter. (See attached Exhibit B Student # 8, student #8 transcript, student #8 ledger.)

In summary for Student 8, the 2008-2009 award year Pell Grant disbursement for the student's quarter starting on 4/27/09 was based on her full-time enrollment status at the beginning of the quarter (15 credit hours). The student withdrew 7/2/09 after completing 7.5 FA quarter credits. A timely and accurate Pell Recalculation was completed on 7/7/09. Student 8 was neither overawarded nor underawarded her 2008-2009 award year Pell Grant. Further, no R2T4 was required under the rules applicable at the time.

Student 10: For the 2008-2009 award year on 3/25/09, student 10 was given a half time Pell award of \$788 (\$2,366 divided by 3 semesters) for the term 3/23/09 – 5/29/09. Student 10 was given another half time Pell award of \$788 (\$2,366 divided by 3 semesters) for the term 6/1/09 – 8/7/09 on 6/8/08. The student's EFC was \$0. However, the student was actually a three quarter time student enrolled in 10 credit hours for the first semester and a full time student enrolled in 12 credit hours for the second semester. According to the 2008-2009 Pell annual award payment schedule for three-quarter time students, Student 10 should have received \$1,182 for the first term and \$1,576 for the second term. A Pell refund was done on 9/17/09 for \$891; however, this refund was done incorrectly..

Response:

Student 10, (b)(6); (b)(7)(C) was enrolled in the Medical Assistant program as an evening student and began classes on 10/20/08. She began her first quarter 10/20/08 with 8 FA credits and was paid part-time Pell Grant of \$788 on 11/3/08. She began her second quarter on 1/12/09 and was paid part-time Pell Grant of \$789 on 1/12/09. She began her third quarter on 3/23/09 and completed 10 FA credits. She was paid \$788 as a part-time Pell Grant on 3/25/09. She began her fourth quarter on 6/1/09 with 12 FA credits and was paid a part-time Pell Grant of \$788 on 6/8/09. She began a fifth quarter on 8/10/09 and was paid \$1783, a full-time Pell Grant from the 09-10 award year on 8/26/09. She only attempted 6 credits in her fifth quarter before she withdrew on 9/4/09.

The following adjustments were made to the account: A Pell Grant recalculation was completed, but the refund of \$891 was incorrectly made to 08-09 Pell on 9/17/09. The College later corrected its recalculation error with an institutional scholarship to the student's account in the amount of \$891 on 9/11/12. The College also made the correct refund to 09-10 on 9/11/12. Though the 09-10 refund was late, it can no longer be considered an overaward. An additional Pell Grant disbursement from 08-09 of \$393 was made on 9/24/09. Also, the College provided an institutional credit of \$1184 in place of the 08-09 Pell Grant on 9/11/12.

This student should have received 08-09 Pell Grant for quarters 1 through 4 totaling \$4339, and 09-10 Pell grant of \$892 for the final quarter. The student received \$2656 in 08-09 Pell Grant funding. The College provided \$2075 in an institutional scholarship in order to hold the student harmless for the 08-09 Pell Grant funds that should have been disbursed. The College agrees that there was a Pell Grant underaward; however, the student was held harmless from the institution's error. (See attached student #10 transcript, student #10 ledger.)

In summary for Student 10, the 2008-09 award year Pell Grant was underawarded based on the student's enrollment status. The student should have received \$4339 in 2008-09 Pell Grant funds, but only received \$2656 net total Pell Grant funds on her account for that period, an underaward of \$1,683. The College provided \$2075 in institutional scholarship funding to hold the student harmless from the Pell Grant underaward. The College agrees that there was an underaward of 2008-09 Pell Grant.

Student 12: For the 2010-2011 award year on 7/27/10, student 12 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/5/10 – 9/10/10. The student's EFC was \$0. However, the student was actually a three quarter time student enrolled in 10 credit hours for the semester. According to the 2010-2011 Pell annual award payment schedule for three-quarter time students, Student 12 should have received \$1,375 for the term. As of yet, a Pell refund has not been done. FC must return \$475 to the Department.

Response

Student 12 (b)(6); (b)(7)(C) was enrolled in the Medical Assistant program starting 10/13/09. The student began her 2010-11 Award Year with her fourth quarter on 7/5/10 taking 10 FA credit hours. She received a disbursement of \$1850 on 7/27/10. On 9/13/10 the student began her fifth quarter taking 3 FA credit hours. She should have been awarded three quarter time 10-11 Pell for her fourth quarter and less than half time Pell for her fifth quarter for a total of \$1850. There was an error in the timing and amounts of the individual disbursements, but the total amount of 2010-11 Pell Grant received was accurate. There is no Pell grant over/under award of 10-11 Pell.

The following are the names of the courses (b)(6); (b)(7)(C) was registered for in her fourth and fifth quarters based on the academic plan for her program of study and the fact that she started her program on October 19, 2009:

Course Name	MOD	Attempt	Completed	Grade	FA Credit Hours	Quarter
Medical Computer Applications	1	Yes	Yes	A	2	4
Health Assessment Techniques	1	Yes	Yes	F	2	4
Professional Development	1	Yes	Yes	C	2	4
Extern Seminar	1	Yes	Yes	F	1	4
Health Assessment Techniques	2	Yes	Yes	F	2	4
Extern Seminar	2	Yes	Yes	F	1	4
Total FA Credits in Quarter # 4					10	

Basic Keyboarding	1	Yes	Yes	None	0 (audit)	5
Health Assessment Techniques	2	Yes	No	W	2	5
Extern Seminar	2	Yes	No	W	1	5
Total FA Credits in Quarter # 5					3	

(The attached FAME screen shot found at Exhibit C (Student #12) shows the credit hour basis of (b)(6); (b)(7)(C) full time Pell Grant disbursement for the 4th quarter. Exhibit C also provides the transcript and ledger for student #12)

In summary for Student 12, the total net 2009-10 award year Pell Grant disbursements for the quarters starting 7/5/10 and 9/13/10 were \$1850. There was an error in the timing and amounts of the individual Pell Grant disbursements for 2010-2011 award year, however, Student 12 was neither overawarded nor underawarded her 2010-2011 award year Pell Grant.

Student 14: For the 2009-2010 award year on 2/17/10, student 14 was given a full time Pell award of \$1,784 (\$5,350 divided by 3 semesters) for the term 2/15/10 – 4/23/10. The student's EFC was \$0. However, the student was actually a half time student enrolled in 7.5 credit hours for this semester. According to the 2009-2010 Pell annual award payment schedule for half time students, Student 14 should have received \$892 for the term. As of yet, a Pell refund has not been done. FC must return \$892 to the Department.

Response:

Student 14, (b)(6); (b)(7)(C) was enrolled in the Cosmetology program starting 12/7/09. She was enrolled as a full time student and received a full time 2009-2010 Pell Grant disbursement of \$1783 on 12/15/09. She began her second quarter as a full time student on 2/15/10 and received a second full time 2009-2010 Pell Grant disbursement of \$1784 on 2/17/10. On 3/22/10, it was determined that the student unofficially withdrew from College having only completed 1 module, 2 courses (TH 870 Fundamentals-Theory, 1.1 credit hours, PR 870 Fundamentals-Practice, 4.9 credit hours), and 6 credit hours of her quarter. Since one course and module of the quarter was completed, no R2T4 was required. The Pell Grant recalculation was correctly made and \$892 in Pell Grant funds was refunded for 2010-2011 on 3/30/10. There was no over/under award of Pell Grant.

The following are the names of the courses (b)(6); (b)(7)(C) was registered for in her second quarter based on the academic plan for her program of study and the fact that she started her program on December 7, 2009:

Course Name	MOD	Attempted	Completed	Grade	FA Credit Hours
TH 870 Fundamentals-Theory	1	Yes	Yes	F	1.1
PR 870 Fundamentals-Practice	1	Yes	Yes	F	4.9
TH 876 Fundamentals-Theory	2	No	No	None	1.1
PR 876 Fundamentals-Practice	2	No	No	None	4.9
Total Credits for the Quarter					12

Based on this course registration for her second quarter, the student's enrollment status was full time for Pell Grant purposes. (b)(6); (b)(7)(C) was correctly awarded and disbursed a full-time Pell Grant for the quarter of \$1,784. Documentation of (b)(6); (b)(7)(C) full time enrollment status is provided in the attached screen shot from the FAME system. The screen shot documents the credit hour basis of (b)(6); (b)(7)(C) full time Pell Grant disbursement for the quarter. (See attached Exhibit D Student # 14, student #14 transcript, student #14 ledger, Shanika Portis R2T4 03-22-10.)

In summary for Student 14, the 2010-2011 award year Pell Grant disbursement for the student's quarter starting on 2/15/10 was based on her full-time enrollment status at the beginning of the quarter. The student withdrew on 3/22/10 after completing 6 FA quarter credits. A timely and accurate Pell Recalculation was completed on 3/30/10. Student 14 was neither overawarded nor underawarded her 2010-2011 award year Pell Grant. Further, no R2T4 was required under the rules applicable at the time.

Student 25: For the 2011-2012 award year on 8/10/11, student 25 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 8/8/11 – 10/13/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for half time students,

Student 25 should have received \$925 for the term. As of yet, a Pell refund has not been done. FC must return \$925 to the Department.

Response:

Student 25, (b)(6); (b)(7)(C) was enrolled in an Associate Degree Medical Assisting program as a full-time student. She started her first quarter on 5/31/11 and was enrolled on a full-time basis with 12 FA credits. (b)(6); (b)(7)(C) was properly disbursed a full-time Pell Grant of \$1850 on 6/16/11. (b)(6); (b)(7)(C) began her second full-time quarter on 8/8/11. She was disbursed her second full-time Pell Grant of \$1850 on 8/10/11. On 8/31/11, (b)(6); (b)(7)(C) unofficially withdrew from classes. The student had attempted 6 FA credit hours for the first module of her quarter. She did not attempt any credits in the second module. The College performed a timely and accurate Pell Recalculation and R2T4 Calculation which lead to a total refund of \$1546 in Pell funds which was completed on 9/22/11. \$925 of which was due to the Pell refund for the quarter. There was no Pell Grant under/over award.

The following are the names of the courses (b)(6); (b)(7)(C) was registered for in her second quarter based on the academic plan for her program of study and the fact that she started her program on May 31, 2011:

Course Name	MOD	Attempted	Completed	Grade	FA Credit Hours
Health Assessment Techniques	1	Yes	No	W	2
Anatomical Structures	1	Yes	No	W	2
Advanced Administrative Procedures	1	Yes	No	W	2
Hematology	2	No	No	None	2
Clinical Procedures	2	No	No	None	2
Human Resource Management	2	No	No	None	2
Total Credits for the Quarter					12

Based on the course registration in this student's second quarter, the student's enrollment status was full time for Pell Grant purposes, (b)(6); (b)(7)(C) was correctly awarded and disbursed a full-time Pell Grant for the quarter of \$1,850. (b)(6); (b)(7)(C) unofficially withdrew effective 8/31/11. Documentation of (b)(6); (b)(7)(C) full time enrollment status is also contained in the attached screen shot from the FAME system. The screen shot documents the credit hour basis of (b)(6); (b)(7)(C) full time Pell Grant disbursement for the quarter. (See attached Exhibit E Student # 25, student #25 transcript, student #25 ledger.)

In summary for Student 25, the student's 2011-12 award year Pell Grant disbursements for the first and second quarters were based on her full-time enrollment status at the beginning of each quarter. Her combined Pell Grant recalculation and R2T4 refund was \$1,546 and was completed on 9/22/11. The student's refund computation has been reviewed and it is correct. The Pell Grant refund also appears to be both accurate and timely. Student 2 was neither overawarded nor underawarded her 2011-2012 award year Pell Grant.

Student 28: For the 2011-2012 award year on 7/7/11, student 28 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/5/11 – 9/9/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for half time students, Student 28 should have received \$925 for the term. A Pell refund was done on 8/30/11 for \$1,422; however, this refund was done incorrectly. To correct this issue, a Pell adjustment was done on 3/9/12 for \$497.

Response:

Student 28, (b)(6); (b)(7)(C) was enrolled in an Associate Degree Medical Assisting program as a full-time student beginning 11/22/10. She began the 2011-2012 award year in her fourth quarter on 7/5/11 enrolled as a full-time student. (b)(6); (b)(7)(C) was properly disbursed a full-time Pell Grant of \$1850 on 7/7/11. On 8/9/11, (b)(6); (b)(7)(C) withdrew after completing 3 courses in her first module of the quarter (Hematology, 2 FA credit hours, Human Resource Management, 2 FA credit hours, Procedural Coding, 2 FA credit hours) for 6 total FA credit hours. She did not attempt any courses in the second module of the quarter. Because (b)(6); (b)(7)(C) dropped after the Department's rule regarding R2T4 as applied to term based programs with modules had changed, a Pell Recalculation and R2T4 were completed for the student and \$1422 in Pell was refunded on 8/30/11. A correction was made on 3/9/12 due on the basis of an internal quality review and \$497 in 2011-2012 Pell funding was retrieved and added back to the account. The total Pell funds disbursed and retained for the quarter was \$925. Though there may be an issue with the timing of the 3/9/12 corrective action, there was no over/under award of the student 11-12 Pell Grant.

The following are the names of the courses (b)(6); (b)(7)(C) was registered for in her fourth quarter based on the academic plan for her program of study and the fact that she started her program on November 22, 2010:

Course Name	MOD	Attempted	Completed	Grade	FA Credit Hours
Hematology	1	Yes	No	A	2
Procedural Coding	1	Yes	No	A	2
Human Resource Management	1	Yes	No	A	2
Guide to Business Etiquette	2	No	No	None	2
Clinical Procedures	2	No	No	None	2
English Fundamentals	2	No	No	None	2
Total Credits for the Quarter					12

Based on this course registration for her second quarter, the student's enrollment status was full time for Pell Grant purposes, (b)(6); (b)(7)(C) was correctly awarded and disbursed a full-time Pell Grant for the quarter of \$1,850. (b)(6); (b)(7)(C) unofficially withdrew effective 8/9/11. Documentation of (b)(6); (b)(7)(C) full time enrollment status is also contained in the attached screen shot from the FAME system. The screen shot documents the credit hour basis of (b)(6); (b)(7)(C) full time Pell Grant disbursement for the quarter. (See attached Exhibit F Student # 28, student #28 transcript, student #28 ledger, (b)(6); (b)(7)(C) R2T4 08-09-11, (b)(6); (b)(7)(C) R2T4 08-09-11 Remediation.)

In summary for Student 28, the student's 2011-12 award year Pell Grant disbursements were based on her full-time enrollment status at the beginning of each quarter (12 credit hours). Her combined Pell Grant recalculation and R2T4 refund was \$1,422 and was completed on 8/30/11. The College performed a quality assurance review and the prior refund was determined to be incorrect, and the College made a correction and requested an additional \$497 in Pell funding on 3/9/12. The corrected recalculation and refund computation have been reviewed and are correct. Student 28 was neither overawarded nor underawarded her 2011-2012 award year Pell Grant.

Student 29: For the 2010-2011 award year on 10/20/10, student 29 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 10/18/10 – 1/7/11. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2010-2011 Pell annual award payment schedule for half time students, Student 29 should have received \$925 for the term. A Pell refund was done on 12/20/10 for \$925.

Response:

Student 29, (b)(6); (b)(7)(C), was enrolled as a full time student in the Associate Degree Medical Assisting program starting 3/22/10. She began her second academic year 10/18/10 and received a full time 2010-2011 Pell Grant disbursement of \$1850 on 10/20/10. She officially withdrew from College for medical reasons on 12/15/10 having completed 1 module, 3 courses (Anatomical Structures, 2 credit hours, Health Assessment Techniques, 2 credit hours, Advanced Administrative Procedures, 2 credit hours), and 6 credit hours of her quarter. Since one module of the quarter was completed and the student dropped prior to 7/1/11, no R2T4 was required. The Pell Grant recalculation was correctly made and \$925 in Pell Grant funding was refunded for 2010-2011 on 12/20/10. There was no over/under award of Pell Grant.

The following are the names of the courses (b)(6); (b)(7)(C) was registered for in her fourth quarter based on the academic plan for her program of study and the fact that she started her program on March 22, 2010:

Course Name	MOD	Attempted	Completed	Grade	FA Credit Hours
Advanced Administrative Procedures	1	Yes	Yes	B	2
Health Assessment Techniques	1	Yes	Yes	B	2
Anatomical Structures	1	Yes	Yes	B	2
Pharmacology	2	No	No	None	4
Drug Administration	2	No	No	None	2
Total Credits for the Quarter					12

Based on this course registration for her second quarter, the student's enrollment status was full time for Pell Grant purposes, (b)(6); (b)(7)(C) was correctly awarded and disbursed a full-time Pell Grant for the quarter of \$1,850. (b)(6); (b)(7)(C) officially withdrew effective 12/15/10. Documentation of (b)(6); (b)(7)(C) full time enrollment status is also contained in the attached screen shot from the FAME system. The screen shot documents the credit hour basis for (b)(6); (b)(7)(C) full time Pell Grant disbursement for the quarter. (See attached Exhibit G Student # 29, student #29 transcript, student #29 ledger.)

In summary for Student 29, the 2010-2011 award year Pell Grant disbursement for the student's quarter starting on 10/18/10 was based on her full-time enrollment status at the beginning of the quarter. The student withdrew 12/15/10 after

completing 6 FA quarter credits. A timely and accurate Pell Recalculation was completed on 12/20/10. Student 29 was neither overawarded nor underawarded her 2010-2011 award year Pell Grant.

Student 32: For the 2010-2011 award year on 7/12/10, student 32 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 7/6/10 – 9/10/10. The student's EFC was \$0. However, the student was actually a half time student enrolled in 6 credit hours for this semester. According to the 2010-2011 Pell annual award payment schedule for half time students, Student 32 should have received \$925 for the term. A Pell refund was done on 9/9/10 for \$925.

Response:

Student 32, (b)(6); (b)(7)(C) was enrolled as a full time student in the Associate Degree Medical Assisting program starting 2/15/10. Enrollment status for this program is determined based on academic credit hours and not a clock to financial aid credit hour conversion. She began the 2010-2011 award year with her third quarter starting 7/6/10. She was paid a full time Pell Grant of \$1850 on 7/12/10. The student withdrew from College on 9/1/10 having attempted but not completed 6 credit hours in the quarter (Medical Insurance Providers, 2 credit hours, Guide to Business Etiquette, 2 credit hours, Advanced Administrative Procedures, 2 credit hours). A Pell recalculation and R2T4 was completed for the student and \$925 of Pell Grant was refunded timely and accurately on 9/9/10. On 9/13/10 the student re-entered College into the same program. She withdrew again on 10/6/10. No aid was received during this enrollment. The student attempted 6 credits (Procedural Coding, 2 credit hours, Organization and Health Services Management, 2 credit hours, Guide to Business Etiquette, 2 credit hours). The College performed an R2T4 calculation and determined that a post-withdrawal disbursement (PWD) of \$14 was due. The College failed to retrieve the PWD, so there was an underaward on the account for 2010-2011 of \$14. The college applied an institutional grant of \$14 to the student account so that the student is held harmless for the underaward. The corrected R2T4 is included.

The following are the names of the courses (b)(6); (b)(7) was registered for in her third quarter which started 7/6/10 based on the academic plan for her program of study and the fact that she started her program on February 15, 2010:

Course Name	MOD	Attempted	Completed	Grade	Academic Credit Hours
Medical Insurance Providers	1	Yes	No	W	2
Guide to Business Etiquette	1	Yes	No	W	2
Advanced Administrative Procedures	1	Yes	No	W	2
Diagnostic Coding	2	No	No	None	2
Effective Writing Skills	2	No	No	None	2
Examination Room	2	No	No	None	2
Total Credits for the Quarter					12

Based on this course registration her third quarter, the student's enrollment status was full time for Pell Grant purposes, (b)(6); (b)(7)(C) was correctly awarded and disbursed a full-time Pell Grant for the quarter of \$1,850. (b)(6); (b)(7)(C) unofficially withdrew effective 9/1/10. Later (b)(6); (b)(7)(C) returned 9/13/10 and attempted additional courses which she also did not complete. Documentation of (b)(6); (b)(7)(C) full time enrollment status is also contained in the attached screen shot from the FAME system. The screen shot documents the credit hour basis of (b)(6); (b)(7)(C) full time Pell Grant disbursement for the quarter. (See attached Exhibit H Student # 32, student #32 transcript, student #32 ledger, (b)(6); (b)(7)(C) R2T4 10-6-10.)

In summary for Student 32, the 2010-2011 award year Pell Grant disbursement for the student's quarter starting on 7/6/10 was based on her full-time enrollment status at the beginning of the quarter (12 credit hours). The student withdrew 9/1/10 after attempting 6 FA quarter credit hours. A timely and accurate Pell Recalculation and R2T4 Calculation were completed on 9/9/10. The student re-entered on 9/13/10 and dropped on 10/6/10. No aid was retrieved, but a PWD of \$14 was due. The college has applied an institutional grant to the student's account so that the student is held harmless for the \$14 underaward. Student 32 was underawarded her 2010-2011 award year Pell Grant by \$14.

Student 37: For the 2010-2011 and 2011-2012 award years on 1/24/11, 4/8/11, 8/26/11, 10/7/11 and 1/12/12 student 37 was given a full time Pell award of \$1,834 (\$5,500 divided by 3 semesters) for the January 2011, April 2011, July 2011, October 2011 and January 2012 terms. The student's EFC was \$15 for both award years. However, the student was actually a three quarter time student enrolled in 9 credit hours for the January 2011 semester. Student 37 was a half time student for the April 2011, July 2011 and October 2011 semesters enrolled in 8 credit hours, 7.5 credit hours and 8 credit hours respectively. Student 37 was actually a three quarter time student enrolled in 9 credit hours for the January 2012 semester. According to the 2010-2011 Pell annual award payment schedule for three quarter time students, Student 37 should have received \$1,375 for the January 2011 term and \$916 for the April 2011. According to the 2011-2012 Pell annual award payment schedule for half time students, Student 37 should have received \$916 for the July 2011 and October 2011 terms

and \$1,375 for the January 2012 term. As of yet, a Pell refund has not been done. FC must return \$3,672 to the Department.

Response:

Student 37 (b)(6); (b)(7)(C) was enrolled in an Associate of Applied Science in Nursing Degree program starting 1/24/11. Enrollment status for this program is determined based on academic credit hours and not a clock to financial aid credit hour conversion. For her first quarter 1/24/11-3/18/11 she was enrolled in the full time remedial course described in the student handbook and paid a \$1834 full time Pell Grant on 1/24/11. For 4/4/11-6/17/11, she was enrolled full time in 15 academic credits and paid a full time Pell on 4/8/11. For 7/5/11-9/16/11, she was enrolled full time in 13 academic credits and paid a full time Pell of \$1833 on 8/26/11. For 10/3/11-12/23/11, the student was enrolled full time with 14 academic credits and paid a full time Pell Grant of \$1834 on 10/7/11. For 1/3/12-3/23/12, the student was enrolled full time with 15 academic credits and paid a full time Pell Grant of \$1833 on 1/12/12. The student ceased attendance on 3/8/12 and was determined to have withdrawn on 3/22/12. She attended 66 of 81 days in the term, which is 81.5% of the term. Therefore, she earned 100% of the aid disbursed for the quarter. There was no over/under award of Pell Grant for this student. (See attached student #37 transcript, student #37 ledger, and Catalog page 31, (Exhibit J) describing remedial nursing course.)

In summary for Student 37, the 2011-2012 award year Pell Grant disbursement for the student's enrollment starting on 1/24/11 was based on her full-time enrollment

status at the beginning of each quarter. The student withdrew 3/22/12 after completing at least 60% of the quarter, so no R2T4 or Pell Recalculation was necessary. Student 37 was neither overawarded nor underawarded her 2011-2012 award year Pell Grant.

Student 41: For the 2011-2012 award year on 9/26/11, student 41 was given a full time Pell award of \$1,850 (\$5,550 divided by 3 semesters) for the term 09/27/11 – 11/7/11. The student's EFC was \$0. However, the student was actually a three quarter student enrolled in 9 credit hours for this semester. According to the 2011-2012 Pell annual award payment schedule for three quarter time students, Student 41 should have received \$1,387 for the term. As of yet, a Pell refund has not been done. FC must return \$463 to the Department

Response:

Student 41, (b)(6); (b)(7)(C) was enrolled in the diploma Medical Office Basic X-Ray Tech program starting 4/5/11. For her first quarter (4/5/11-6/28/11), she completed 12 FA credit hours (Medical Anatomy & Physiology, 3 FA credit hours, Medical Terminology, 3 FA credit hours, Basic Life Support, 3 FA credit hours, Medical Office Procedures, 3 FA credit hours) as a full time student and was paid a full time 2010-2011 Pell Grant disbursement of \$1850 on 7/25/11. For her second quarter (6/29/11-9/26/11), she completed 12 FA credit hours (Introduction to Limited Radiography, 3 FA credit hours, Electronic Health Records, 3 FA credit hours, X-Ray Science, 3 FA credit hours, Radiography Anatomy, Positioning and Pathology, 3 FA credit hours) as a full time student and was paid a full time 2010-2011 Pell Grant disbursement of \$1850 on 7/25/11. For her third quarter (9/27/11-12/21/11), she completed 12 FA credit hours (Special Topics in Radiography, 3 FA credit hours, Career Development, 3 FA credit hours, Medical X-Ray Technology Externship, 6 FA credit hours) as a full time student and was paid a full time 2011-2012 Pell Grant disbursement of \$1850 on 9/26/11.

The following are the names of the courses Ms. Moore was registered for in her third quarter based on the academic plan for her program of study and the fact that she started her program on April 5, 2011:

Course Name	MOD	Attempted	Completed	Grade	FA Credit
Career Development	1	Yes	Yes	A-	3
Special Topics in Radiography	1	Yes	Yes	B	3
Medical X-Ray Technology Externship	2	Yes	Yes	B+	6
Total Credits for Quarter					12

Based on this course registration for her second quarter, the student's enrollment status was full time for Pell Grant purposes, (b)(6); (b)(7)(C) was correctly awarded and disbursed a full-time Pell Grant for the quarter of \$1,850. (b)(6); (b)(7)(C) unofficially withdrew effective 12/20/11. Documentation of (b)(6); (b)(7)(C) full time enrollment status is also contained in the attached screen shot from the FAME system. The screen shot documents the credit hour basis of (b)(6); (b)(7)(C) full time Pell Grant disbursement for the quarter. (See attached Exhibit I Student # 41, student #41 transcript, student #41 ledger.)

In summary for Student 41, the 2011-2012 award year Pell Grant disbursement for the student's enrollment starting on 9/27/11 was based on her full-time enrollment status at the beginning of the quarter and is accurate based on the student's academic transcript. The student completed the quarter having taken full time (12) FA credit hours, and was paid full time Pell Grant. Student 41 was neither overawarded nor underawarded her 2011-2012 award year Pell Grant.

Summary for Finding 2. Pell Grant Overpayment / Underpayment.

Award Year	Program Review Instances	College's Explanation Of Concern	Remaining Instances Of Non-Compliance	Remaining Pell Grant Overpayment	Remaining Pell Grant Underpayment
08/09	4	4	1	0	#10,\$1,683
09/10	1	1	0	0	0
10/11	4	4	1	0	#32,\$14
11/12	4	4	0	0	0
Error Rate	12* of 44 27.3%		2 of 44 4.5%		0

- Student #37 was identified in the Report as having errors in both the 10/11 and 11/12 award year; however, the twelve instances in the total is an unduplicated student count

Given the that the actual error rate appears to be 4.5% with a total liability of \$1697, we respectfully believe that the College should not be required to perform a 100% file review of all Pell Grant awards for three award years: 2008-2009, 2010-2011, and 2011-2012.

Finding 2: Return to Title IV Not Calculated Correctly

Student 2: For the 2008-2009 award year, student 2 withdrew on 3/26/09 and a R2T4 calculation was done on 3/31/09. The R2T4 displays a payment period begin date of 3/23/09 and an end date of 5/29/09 with an LDA of 3/26/09. The student completed 4 days of the 68 scheduled days of the payment period which equals to a .0588 percentage of Title IV Aid earned. The R2T4 worksheet uses the incorrect Pell grant net disbursement and does not calculate a return of Title IV funds correctly.

Response:

Student 2, (b)(6); (b)(7)(C) was enrolled in a Medical Assistant diploma program as a full-time student. (b)(6); (b)(7)(C) was also identified in Finding 2-Pell Grant over/under award. Her first academic year consisted of three standard ten-week quarters. She began her fourth quarter on 3/23/09 enrolled as a $\frac{3}{4}$ time student. A full time Pell Grant disbursement was received 4/1/09. The college recognized the error and made a timely correction to the error with the Pell recalculation. The student officially withdrew from College 3/31/09. The student had attempted one course titled "Simulating the Medical Office" for 2 FA credit hours. She attended 4 days out of the 68 total days in the quarter which is equal to 5.88% of the total days in the quarter. The student was therefore eligible for 5.9% of the Title IV aid for the quarter - or \$394 of the \$1577 2008-2009 Pell Grant. She had no originated loans for the quarter, so there was no loan amount that "could have been disbursed." 5.9% of the total eligible aid of \$394 is \$23.25. This is the amount that was calculated on the College's R2T4 form. An accurate and timely Pell recalculation and an R2T4 were completed. The Pell recalculation correctly reduced the Pell to the less-than-half time amount of \$394. The R2T4 portion of the refund correctly refunded the percentage of the Pell unearned by the student. The total Pell Recalculation and R2T4 Pell Refund of \$1,554 was completed 4/6/09. (See attached student #2 transcript, student #2 ledger, Tonyetta Sellers R2T4 04-06-09.)

In summary for Student 2, the 2008-2009 award year Pell Grant disbursement for the student's quarter starting on 3/23/09 was based on her full-time enrollment status at the beginning of the quarter. Her combined Pell Grant recalculation and R2T4 refund was \$1,544 and was completed on 4/6/09. The R2T4 calculation was accurate based on her enrollment status, percentage of quarter days completed, and eligible aid for the quarter. The R2T4 calculation for student 2 was accurate.

Student 9: For the 2009-2010 award year, student 9 withdrew on 1/08/10 and a R2T4 calculation was done on 1/26/10. The R2T4 displays a payment period begin date of 11/23/09 and an end date of 2/12/10 with an LDA of 1/08/10. The student completed 31 days of the 66 scheduled days of the payment period which equals to a .4697 percentage of Title IV Aid earned. The R2T4 worksheet incorrectly rounds .4697 to 100% and does not calculate a return of Title IV funds.

Response:

Student 9, (b)(6); (b)(7)(C) was enrolled in a Medical Assistant diploma program as a full-time student.

(b)(6); (b)(7)(C) completed each of the first five quarters in her diploma program of study. The student started her fifth and final quarter of her program of study on 11/23/09. (b)(6); (b)(7)(C) was enrolled as a full-time student for her fifth quarter and was correctly disbursed a full-time Pell Grant of \$1,783 on 12/1/09. (b)(6); (b)(7)(C) stopped attending her classes on 1/8/10 after completing the first module in the quarter. (b)(6); (b)(7)(C) did not start/attempt any courses in the second module of her fifth quarter. Therefore, a Pell Grant recalculation was required, but, in accordance with DCL GEN-00-24, a R2T4 calculation was not required because the student attempted and completed five FA quarter credit hours during the quarter (Pharmacology, 4 credit hours, Extern seminar, 1 credit hour). The College's R2T4 calculation worksheet correctly rounded the percentage to 100% because the worksheet was specifically designed to consider the credits completed in the quarter and apply the provisions of DCL GEN-00-24.

At the time of the drop, the College did a Pell Grant recalculation and refunded \$891 in Pell Grant. Since the student only attempted 5 FA credit hours, the College should have refunded \$1337. There was an overaward of \$446. The College refunded an additional \$446 in 2009-10 Pell on 3/12/13. (See attached DCL GEN-00-24, (b)(6); (b)(7)(C) R2T4 1-27-10, student #9 transcript, student #9 ledger.)

In summary for Student 9, this student completed 1 module of the ten week quarter therefore, under Department rules effective at the time, no R2T4 was required. The College's R2T4 worksheet, which was used as a matter of policy in order to avoid incorrect determinations regarding the need to calculate an R2T4 correctly, calculated that the student was eligible for 100% of the funds disbursed. Student 14 did not have an incorrectly calculated R2T4 because no R2T4 was required. However, there was a Pell overaward associated with the Pell recalculation that the College found and corrected in its review.

Student 14: For the 2009-2010 award year, student 14 withdrew on 3/9/10 and a R2T4 calculation was done on 3/25/10. The R2T4 displays a payment period begin date of 2/15/10 and an end date of 4/23/10 with an LDA of 3/9/10. The student completed 23 days of the 68 scheduled days of the payment period which equals to a .3382 percentage of Title IV Aid earned. The R2T4 worksheet incorrectly rounds .3382 to 100% and does not calculate a return of Title IV funds.

Response:

Student 14, (b)(6); (b)(7)(C) was enrolled in the Cosmetology program as a full time student starting 12/07/09. (b)(6); (b)(7)(C) was also identified in Finding Number 2 – Pell Overaward / Underaward.

She was enrolled as a full time student and received a full time 2009-2010 Pell Grant disbursement of \$1783 on 12/15/09. She began her second quarter as a full time student on 2/15/10 and received a second full time 2009-2010 Pell Grant disbursement of \$1784 on 2/17/10. On 3/22/10, the College determined that the student unofficially withdrew from the College having completed 1 module and 2 courses (TH 870 Fundamentals-Theory, 1.1 credit hours, PR 870 Fundamentals-Practice, 4.9 credit hours), or 6 credit hours of her quarter. Since 6 credit hours were completed in the first module of the quarter, a Pell recalculation was required. In accordance with DCL GEN-00-24, an R2T4 calculation was not required. The College completed an accurate and timely Pell Grant recalculation and \$892 Pell Grant was refunded for 2010-2011 on 3/30/10. (See attached DCL GEN-00-24, Shanika Portis R2T4 3-22-10, student #14 transcript, student #14 ledger.)

The College's R2T4 calculation worksheet correctly rounded the percentage completed to 100% *because the worksheet was specifically designed to consider the credits completed in the quarter and apply the provisions of DCL GEN-00-24.*

In summary for Student 14, there was no R2T4 required because the student successfully completed 1 module of the quarter. The College performed the required Pell Grant recalculation and, the College's R2T4 calculation worksheet correctly calculated that the student was eligible for 100% of the funds disbursed because the student had completed a full module. Student 14 did not have an incorrectly calculated R2T4 because no R2T4 was required under Department rules in effect at the time.

Student 19: For the 2010-2011 award year, student 19 withdrew on 10/19/10 and a R2T4 calculation was done on 11/05/10. The R2T4 displays a payment period begin date of 9/13/10 and an end date of 11/15/10 with an LDA of 10/19/10. The actual end date of the term was 11/19/10. The student completed 37 days of the 68 scheduled days of the payment period which equals to a .5441 percentage of Title IV Aid earned. The R2T4 worksheet

displays the payment period end date as 11/15/10 and calculates the wrong percentage of Title IV earned of .5781 percentage. The R2T4 worksheet also incorrectly rounds the .5781 percentage to 100% and does not calculate a return of Title IV funds.

Response:

Student 19, (b)(6); (b)(7)(C) was enrolled in the Cosmetology program as a full time student starting 2/15/10. She withdrew 11/3/10 with an LDA of 10/19/10. The quarter of the Period of Withdrawal began on 9/13/10. Prior to withdrawal, the student successfully completed one class (Special effects of Hair Color, 7.5 FA credit hours) with an "A" during the first module of the quarter. The student attempted a class during the second module of the quarter (Creative Hair Styling, 7.5 FA credit hours) for a total of 15 FA credits for the quarter. Therefore, neither a Pell Recalculation nor a R2T4 was required (see attached DCL GEN-00-24, (b)(6); (b)(7)(C) R2T4 11-3-10, student #19 transcript, student #19 ledger).

The College's R2T4 calculation worksheet correctly rounded the completion percentage to 100% because the worksheet was specifically designed to consider the credits completed in the quarter and apply the provisions of DCL GEN-00-24.

In summary for Student 19, there was no R2T4 calculation required because the student successfully completed 1 module of the quarter. The College's R2T4 worksheet, which was used as a matter of policy in order to avoid incorrect determinations regarding the need to calculate an R2T4 correctly, calculated that the student was eligible for 100% of the funds disbursed. Student 19 did not have an incorrectly calculated R2T4 because no R2T4 was required.

Student 28: For the 2011-2012 award year, student 28 withdrew on 8/19/11 and a there was no R2T4 worksheet in the student's file.

Response:

Student 28, (b)(6); (b)(7)(C) was enrolled in an Associate Degree Medical Assisting program as a full-time student beginning 11/22/10. (b)(6); (b)(7)(C) was also identified in Finding Number 2 – Pell Grant Overaward / Underaward.

Although the paper copies of the R2T4 calculations for this former student may not have been in the file provided during the review, electronic copies were available and saved in a password protected file on the College server. We do not recall the reviewers requesting assistance regarding this matter during the review.

(b)(6); (b)(7)(C) began the 2011-2012 award year in her fourth quarter on 7/5/11 enrolled as a full-time student. (b)(6); (b)(7)(C) was properly disbursed a full-time Pell Grant of \$1850 on 7/7/11. On 8/9/11 (b)(6); (b)(7)(C) withdrew from courses after completing 3 courses in her first module of the quarter (Hematology, 2 FA credit hours, Human Resource Management, 2 FA credit hours, Procedural Coding, 2 FA credit hours) for 6 total FA credits. She did not attempt any courses in the second module of her fourth quarter. A Pell Grant recalculation and R2T4 were completed for the student and \$1422 in Pell was refunded on 8/30/11. A correction was performed on 3/9/12 due to an internal quality assurance review and \$497 2011-2012 Pell was retrieved and added back to the student's account. The total Pell Grant for the quarter was accurately paid as \$925. Though there may be an issue with the timing of the corrective actions, the financial aid on the account is accurate. The original and corrected R2T4 calculations are attached. (See attached student #28 transcript, student #28 ledger, (b)(6); (b)(7)(C) R2T4 08-09-11, (b)(6); (b)(7)(C) R2T4 08-09-11 Remediation.)

In summary for Student 28, The original and corrected versions of the student's R2T4 calculations were saved electronically. They are available and have been reviewed for accuracy. The corrections were made to the account at the time the original R2T4 was corrected in March 2012. The student account reflects the appropriate amount of aid disbursed. The R2T4 calculations were electronically saved and are attached for your review.

Student 29: For the 2010-2011 award year, student 29 withdrew on 11/18/10 and a R2T4 calculation was done on 12/16/10. The R2T4 displays a payment period begin date of 10/18/10 and an end date of 1/7/11 with an LDA of 11/18/10. The student completed 32 days of the 65 scheduled days of the payment period which equals to a .4923 percentage of Title IV Aid earned. The R2T4 worksheet incorrectly rounds .4923 to 100% and does not calculate a return of Title IV funds.

Response:

Student 29,

NOTE: (b)(6); (b)(7)(C) was also identified in Finding Number 2 – Pell Overaward / Underaward.

(b)(6); (b)(7)(C) was enrolled as a full time student in the Associate Degree Medical Assisting program starting 3/22/10. She began her second academic year 10/18/10 and received a full time 2010-2011 Pell Grant disbursement of \$1850 on 10/20/10. She officially withdrew from College for medical reasons on 12/15/10 having completed 1 module, 3 courses (Anatomical Structures, 2 credit hours, Health Assessment Techniques, 2 credit hours, Advanced Administrative Procedures, 2 credit hours), or 6 credit hours of her quarter. Since at least one modular course of the quarter was completed, no R2T4 was required under the rules in effect at the time. The College completed an accurate and timely Pell recalculation and \$925 Pell Grant was refunded for 2010-2011 on 12/20/10. There was no over/under award of Pell Grant. (See attached (b)(6); (b)(7)(C) R2T4 12-15-10, student #29 transcript, student #29 ledger.)

The College's R2T4 calculation worksheet, which the College was not required to use under the law, correctly rounded the percentage completed to 100% because the worksheet was specifically designed to consider the credits completed in the quarter and apply the provisions of DCL GEN-00-24.

In summary for Student 29, there was no R2T4 calculation required because the student successfully completed six credits in the first module in this quarter. The College performed the required Pell Grant recalculation and returned the relevant funds. The College's R2T4 worksheet, which it used in an abundance of caution, correctly calculated that the student was eligible for 100% of the funds disbursed. Student 29 did not have an incorrectly calculated R2T4 because no R2T4 was required under the rules in effect at the time.

Summary for Finding 3. Return to Title IV Not Calculated Correctly

Award Year	Program Review Instances	College's Explanation Of Concern	Remaining Instances Of Non-Compliance	Additional R2T4 Refund
08/09	1	1	0	0
09/10	2	2	0	0
10/11	2	2	0	0
11/12	1	1	0	0
Error Rate	6 of 43 14%		0 of 43 0%	0

Given that the actual error rate appears to be 0% and there is no liability for R2T4 errors, we respectfully believe that the College should not be required to perform a 100% file review of all Return to Title IV calculations for Pell Grant awards for award years 2009-2010 and 2010-2011.

We respectfully request that you review the information and explanations provided above for findings two and three. Assuming you concur with our conclusions, we believe there is not a need to perform the requested file reviews and attestations for findings 2 and 3.

Thank you for considering our request.

Please feel free to contact me at (251) 222-0945 or FWilliams@edaff.com if you have any questions or need additional documentation.

Sincerely,

(b)(6); (b)(7)(C)

Felicia Williams
Director of Financial Aid

Appendix G

Department's Letter - Finding 2 & 3



FYI

April 15, 2013

Duncan Anderson, President
Fortis College - Mobile
3590 Pleasant Valley Road
Mobile, AL 36609

UPS Tracking # 1ZA5467Y0298139482

RE: Program Review Response – File Reviews
OPE ID: 023410
PRCN: 2012-4-04-28049

Dear Mr. Anderson:

The School Participation Division-Atlanta has reviewed Fortis College's (FC) April 3, 2013 response to the February 7, 2013 Program Review Report issued by the Department. In FC's response, the institution provided additional documentation in response to Finding 2: Pell Overpayment / Underpayment and Finding 3: Return to Title IV Calculation Errors.

In the Program Review Report, FC was required to engage an Independent Public Accountant (IPA) to test the file review completed by the institution for Finding 2: Pell Overpayment / Underpayment and Finding 3: Return to Title IV Calculation Errors. The file review is due to the Department within 90 days of receipt of the Program Review Report.

FC was also required to submit the IPA's procedures designed for testing the accuracy and completeness of the file reviews. The suggested procedures were to be provided to Angelique James, Institutional Review Specialist, within 30 days of the institution's receipt of the Program Review Report. These procedures were due to our office on March 13, 2013.

Finding 2: Pell Overpayment / Underpayment

For this finding, FC was required to perform a full file review for all of the 2008-2009, 2010-2011 and 2011-2012 Federal Pell Grant recipients. Due to the additional documentation received from FC on April 3, 2013, FC must only perform file reviews for the 2008-2009 award year.

Award Year	Student #	Status - FG Disputes	Additional Documentation Required	Errors after Analysis
2008/2009	2	Disputed		Yes
2008/2009	5	Disputed		No
2008/2009	8	Disputed		No
2008/2009	10	Disputed		Yes

Federal Student Aid, School Participation Division - Atlanta
61 Forsyth Street SW, Room 18T40, Atlanta, GA 30303
www.FederalStudentAid.ed.gov

Federal Student

An OFFICE of the U.S. DEPARTMENT of EDUCATION

Award Year	Student #	Status	FC Disputes	Additional Documentation Required	Errors after Analysis
2009/2010	14	Disputed			No
2010/2011	12	Disputed			No
2010/2011	29	Disputed			No
2010/2011	32	Disputed			No
2010/2011	37	Disputed			No
2011/2012	25	Disputed			No
2011/2012	28	Disputed			No
2011/2012	37	Disputed			No
2011/2012	41	Disputed			No

Although students 2 and 10 were not overawarded Pell for the entire award year, the students were overawarded Pell grant disbursements in several payment periods within the award year. The school corrected the overawards with Pell refunds, however, it appears that FC did not verify the enrollment status before disbursing Title IV funds for the payment periods within the 2008-2009 award year.

Finding 3: Return to Title IV Calculation Errors

For this finding, FC was required to perform a full file review for all of the 2009-2010 and 2010-2011 Federal Pell Grant recipients. Due to the additional documentation received from FC on April 3, 2013, FC is not required to perform the file reviews for 2009-2010 and 2010-2011 Federal Pell grant recipients.

Award Year	Student #	Status	FC Disputes	Additional Documentation Required	Error
2008/2009	2	Disputed			No
2009/2010	9	Disputed			No
2009/2010	14	Disputed			No
2010/2011	19	Disputed			No
2010/2011	29	Disputed			No
2011/2012	28	Disputed			No

Required Action

FC must complete the required file review for Finding 2: Pell Overpayment / Underpayment. FC must correct the errors as described above and resubmit in the Program Review Report response. The attachment to this letter includes the student information related to the findings.

The auditor attestation for the file review must be sent directly to Angelique James of this office within 30 calendar days of the date of this letter. If this corrected response is not received by that date, a Final Program Review Determination may be issued based upon information received by that date. If needed, FC may request an extension for file review that is due to the Department within 90 days of receipt of the Program Review Report.

Please see the enclosure Protection of Personally Identifiable Information (PII) for instructions regarding submission of required data / documents containing PII.

As a reminder, an institution that participates in any Title IV, HEA program is required to cooperate with the Secretary and the Secretary's representatives in the conduct of program reviews. 34 C.F.R. § 668.24(f)(1). The institution must cooperate by providing timely access to all requested records and personnel. 34 C.F.R. § 668.24(f)(2)(i) and (ii).

If you have any questions concerning this report, please contact Angelique James at 404-974-9441 or angelique.james@ed.gov.

Sincerely,

(b)(6); (b)(7)(C)

Chris Miller
Compliance Manager

cc: Felicia Williams, Financial Aid Administrator

Enclosure:
Protection of Personally Identifiable Information
Appendix A

Appendix A - Student Sample to the Program Review Report

School: Fortis College - Mobile

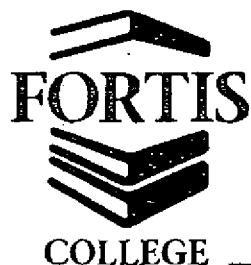
OPEID: 023410

Student	Award Year	SSN Last 4	Last Name	First Name	Campus
2	2008/2009	(b)(6); (b)(7)(C)			Montgomery
5	2008/2009				Montgomery
8	2008/2009				School of Cosmetology
9	2008/2009				Mobile
10	2008/2009				Montgomery
12	2009/2010				Pensacola
14	2009/2010				Pensacola
19	2009/2010				School of Cosmetology
25	2010/2011				Mobile
28	2010/2011				Mobile
29	2010/2011				Montgomery
32	2010/2011				Montgomery
37	2011/2012				Pensacola
41	2011/2012				Montgomery Nursing

Confidential - This document contains Personally Identifiable Information

Appendix H

Institution's Written Response



3590 Pleasant Valley Road • Mobile, Alabama 36609

251-344-1203 Telephone • 251-344-1299 Fax

August 19, 2013

Ms. Angelique James
Institutional Review Specialist
U.S. Department of Education
Federal Student Aid
61 Forsyth Street, Suite 18T40
Atlanta, Georgia 30303-3104

OPE ID: 02341000
PRCN: 2012-4-04-28049

Dear Ms. James:

We are in receipt of Mr. Chris Miller's letter of February 7, 2013, which included the report of the Department's review of Fortis College's participation in the Title IV programs for the 2009, 2010, 2011 and 2012 award years conducted September 10, 2012 to September 14, 2012. In his letter, Mr. Miller requested that we send our response to the findings in the program review to you. We greatly appreciate the courtesy and guidance that you, Ms. Sherry Blackman and Mr. Oscar Howard provided to us during your visit last September.

We are also in receipt of Mr. Chris Miller's letter of April 15, 2013, which was in response to my letter to you of April 3, 2013. In addition to my letters to you, there were a series of email exchanges between us regarding your review and approval of the three sets of "Agreed Upon Procedures," which would be followed by our Independent Public Accountants (IPAs) in the performance of the following attestations: 1) full file for all 2009-2010 Title IV recipients with an "invalid" high school diploma or with discrepant information regarding high school graduation (Approval of IPA's procedures received by email on 5/2/13); 2) full file review of Pell Grant disbursements to recipients for 2008-2009 (approval of IPA's procedures received by email on 5/1/13); and 3) full file of FWS recipients to determine the amount of FWS hours worked during class hours for 2008-2009 and 2011-2012 FWS recipients (Approval of IPA's procedures received by email on 4/15/13). Finally, we also received your April 19th email approval of a ninety (90) day extension for our response to the program review report.

The following is our response to the eleven findings in the Program Review Report:

Finding 1: Ineligible High School Diplomas

I. Finding 1 Is Contrary to the Law In Effect During the File Review Period and Should Be Closed Without Further Requirements.

Finding 1 of the February 7, 2013 Program Review Report (PRCN: 2012-4-04-28049) issued to Fortis College – Mobile (hereinafter, "College") is entitled "Ineligible High School Diploma." Finding 1 alleges that the College did not comply with 34 C.F.R. § 668.32(a)(2)(e)(1) [sic] and 34 C.F.R. § 668.16(p) for eight students who "appeared to have an invalid high school diploma" from Atlantic Southeastern Academy (ASA) and American Worldwide Academy (AWA).¹ The Finding requires the College to perform a full file review for all 2009-2010 Title IV recipients admitted to the institution.

As discussed in greater detail below, the College respectfully disagrees with the assertions in Finding 1 and requests that the finding be closed without further requirements of the College for the following reasons:

- The Finding is contrary to the regulations in effect during the file review period. The applicable regulations did not define a high school diploma and did not place any obligation on institutions to independently determine the validity of high school diplomas. The Department acknowledged this point when it published new rules on this topic effective after the file review period. See Section II.
- The Finding relies in part on a regulation (34 C.F.R. 668.16(p)) that did not take effect until after the file review period. Moreover, the Department explicitly stated in published guidance that it would not apply the regulation retroactively, nor require institutions to follow its procedures until July 1, 2011. The Finding

¹ While the Program Review Report states that "there were eight students in a sample of 43 that appeared to have an invalid high school diploma from American Southeastern Academy (ASA) and American Worldwide Academy (AWA)," seven students in the sample possessed a high school diploma from those schools (the correct name for ASA is Atlantic Southeastern Academy). One student file contained documentation from a public high school in Mississippi.

violates this directive and seeks to punish the College for failure to follow a requirement that did not at the time exist. See Section II.

- Even if the College had been required to determine the validity of the two high schools referenced in Finding 1, the record demonstrates that those high schools and the diplomas issued to the cited students were valid under then applicable law. See Section III.
- Although the record did not support the imposition of a file review requirement, the College conducted the required file review in order to cooperate with the program review process. The College conducted the file review in accordance with procedures agreed to by the Department and had the results attested to by an independent certified public accounting firm. The file review confirmed the eligibility of the eight students cited in Finding 1 and all students who attended ASA and AWA. Moreover, the file review identified only isolated instances of currently missing high school diplomas and of students who attended three schools for which the College could not currently confirm validity under the Agreed Upon Procedures. The College does not concede that these students constitute instances of noncompliance under the law in effect during the file review; rather, the results demonstrate the absence of material noncompliance for this finding even under the Agreed Upon Procedures which were stricter than the requirements under then applicable law. See Section IV.
- The Department did not promulgate rules requiring institutions to evaluate the validity of a student's high school completion until late 2010, which rules were effective on July 1, 2011. Nevertheless, the College proactively modified its high school diploma policies in May 2010, well before the Department's new rule became effective on July 1, 2011. These policies comply with current law. See Section V.

II. The Finding is Inconsistent with the Regulations in Effect During the File Review Period.

The applicable law does not support Finding 1 for several reasons. First, the Department regulations in effect during the 2009-2010 award year did not define a high

school diploma and did not place any obligation on institutions to independently determine the validity of individual high schools. The rule then in effect (34 C.F.R. § 668.32(e)(1) (2009)) stated that a student must possess either a high school diploma or its recognized equivalent in order to be eligible for federal student financial aid under Title IV of the HEA:

A student is eligible to receive title IV, HEA program assistance if the student—[...] (e)(1) Has a high school diploma or its recognized equivalent [...].

This rule does not describe what constitutes a “high school diploma.” Moreover, the rule does not require an institution to determine the validity of diplomas or of the issuing high schools.

Second, the other regulation cited by Finding 1 (34 C.F.R. § 668.16(p)) did not take effect until after the 2009-2010 file review period on July 1, 2011. Significantly, the Department made clear on several occasions during the creation of that regulation that institutions did not have a responsibility to evaluate the validity of a high school diploma. The Department stated in its June 18, 2010 Notice of Proposed Rulemaking:

The current regulations do not define the term “high school diploma” or otherwise include provisions regarding the evaluation of the validity of a student’s high school diploma.

[...]

We propose adding paragraph (p) to § 668.16 to provide that it is the institution’s responsibility to evaluate the validity of the diploma if either the institution or the Secretary believes that a closer examination of the diploma is warranted.²

The Department’s Acting Deputy Assistant Secretary for Policy, Planning and Innovation reiterated the point regarding the absence of existing law in this topic shortly thereafter in a letter stating:

[T]here is no Federal rule currently in place that would prohibit an AWA graduate that meets the student eligibility requirements under 668.32 from receiving Federal student aid based on that standard.”³

² 75 Fed. Reg. 34823 (June 18, 2010)

³ Letter from David Bergeron, Acting Deputy Assistant Secretary for Policy, Planning, and Innovation, U.S. Department of Education, to American Worldwide Academy (July 30, 2010). See Exhibit 1-A.

When institutions expressed concern about the retroactivity of the new requirement and "requested that the Department declare that § 668.16(p) will not be retroactive," the Department provided the following assurance:

This requirement will apply to institutions beginning on July 1, 2011, the effective date of these regulations. This means that institutions will be required to follow the procedures developed under 668.16(p) for any applicant who completes a FAFSA beginning with the 2011-2012 award year."⁴

Yet, Finding 1 violates this assurance and recognition by requiring the College to comply with new requirements prior to their effective date during a time period in which the Department acknowledged no such requirements existed.

Third, the Department's published guidance did not impose a responsibility on institutions to determine the validity of a high school diploma. Indeed, during the file review period, the Department allowed students to self-certify on the FAFSA the receipt of a high school diploma or GED or that he has completed secondary school through homeschooling as defined by state law.⁵ The College went above and beyond this requirement and the practices of other institutions by requiring students to provide copies of high school diplomas. Even though the Department did not require the College or other schools to collect diplomas from students, it now alleges that the College not only was required to collect the diplomas, but examine the validity of the diploma and the issuing high school.

Fourth, the only guidance the Department provided during the relevant period was that, if an institution had questions regarding the validity of a diploma, it could check with the department of education in the state in which the high school was located to determine if the school was recognized by that state. Specifically, the 2009-2010 Federal Student Aid Handbook stated, in a sidebar, the following:

What's a valid high school diploma?:

As we note on page 6, students self-certify that they have a high school diploma so a copy of one is not required for the financial aid office. But with the appearance of high school "diploma mills", you might have

⁴ 75 Fed. Reg. 66889 (Oct. 29, 2010)

⁵ 2009 – 2010 Federal Student Aid Handbook, Vol. 1, p.1-6.

concerns about the validity of a diploma from a particular school. One resource to check is the department of education for the state in which the school is located. If the department has jurisdiction over the high school, they can tell you if a diploma from the school (which does not have to be accredited) is recognized by their state.⁶

This was not a requirement to verify every single high school diploma with the education department in the high school's state. As noted above, the Department acknowledged that it had no such rule and that schools were not even required to collect high school diplomas. Further, the Department's guidance acknowledged that some state departments of education may not approve private high schools -- and it does not assert that Title IV participating institutions had any further obligations in that circumstance. The Department had even noted on October 29, 2010 that it was not in the position to determine which high schools were valid or invalid and that it did not intend to publish a list of valid or invalid high schools in the future.⁷ Even if the law had required schools to confirm the validity of high schools, the record demonstrates that the two high schools cited as appearing to be "invalid" were in fact valid because, among other reasons, they appear on a directory published by the state in which the high schools operate that is used by the state for state grant purposes. See Section III.

For all of these reasons, the Department's law in effect during the file review period did not define a high school diploma or "valid" high school diploma and placed no affirmative obligation on institutions to independently determine the validity of individual high schools. When it finally did impose such a rule, the Department stated that it would not apply that rule retroactively. Accordingly, Finding 1 is contrary to law and should be closed.

III. Even if the College had been required by law to determine the validity of the high school diplomas cited in Finding 1, the record demonstrates that they were valid.

The Program Review Report states that six students with a diploma from Atlantic Southeastern Academy ("ASA") and one student with a diploma from American Worldwide Academy ("AWA") "appeared" to have an "invalid high school diploma." The

⁶ 2009 – 2010 Federal Student Aid Handbook, Vol. 1, p.1-5.

⁷ 75 Fed. Reg. 66887 (Oct. 29, 2010).

Program Review Report directed the College to "provide proof that the students identified above either have a valid high school diploma, GED, or took the ability to benefit test." For the reasons described below, ASA and AWA were valid high schools and all of the cited students had valid diplomas. Section III.a describes the indicia of validity possessed by ASA and AWA. Section III.b addresses the specific student files identified in the Program Review sample.

a. ASA and AWA are valid high schools.

Though the College was under no obligation to verify the validity of ASA and AWA (see Section II above), there are several resources that demonstrated the validity of those high schools.

First, the Department's Federal Student Aid Handbook stated that "[o]ne resource to check is the department of education for the state in which the school is located."⁸ ASA and AWA are located in Florida. The state of Florida's Department of Education, Office of Independent Education publishes a Florida Private School Directory. Both ASA and AWA are listed in the Directory.⁹ Moreover, the Directory is not a mere listing of high schools in Florida. Private high schools that appear in the Florida Private School Directory are called "Eligible High Schools" by the Florida Department of Education, Office of Student Financial Assistance.¹⁰ A student must have graduated from an Eligible High School in order to successfully submit an electronic Florida aid application. Also, "Florida eligible non-public secondary schools must, in order to annually maintain eligibility to participate in the Florida Bright Futures Scholarship Program [...] [r]egister as a non-public high school via the Private Annual School Survey [...] with the FDOE."¹¹ This indicates Florida itself utilizes the directory for financial aid purposes.

⁸ 2009 – 2010 Federal Student Aid Handbook, Vol. I, p.1-5.

⁹ See Exhibit 1-B (Florida Department of Education, Office of Independent Education and Parental Choice, Florida Private School Directory – Dade County (accessed Apr. 9, 2011)).

¹⁰ See Exhibit 1-C (Florida Student Scholarship & Grant Programs, "How to Appear on the List of Public or Private High Schools") and Exhibit 1-D (Florida Student Scholarship & Grant Programs, "Eligible Private High Schools").

¹¹ See Fla. Admin. Code Ann. r. 6A-20.028(8)(c).

Second, both ASA and AWA are listed on the Department of Education's own National Center for Education Statistics (NCES) list of private schools.¹² In its most recent report (covering data from the period 2009-2010), NCES states that the Private School Universe Survey "is designed to generate biennial data on the total number of private schools, students, and teachers, and to build a universe of private schools to serve as a sampling frame of private schools for NCES sample surveys."¹³ As discussed in Section IV below, the Department approved the Agreed Upon Procedures for the Finding 1 file review that, among other things, called on the College and the auditor to verify high school validity by checking to see if the high school was listed in the NCES Private School Universe Survey. Both ASA and AWA appear in the Survey.

Third, both ASA and AWA are listed by the College Board,¹⁴ the nonprofit membership organization of post-secondary schools that administers the SAT and other exams. As one Department official explained during a public presentation, the College Board is a source that can be used when assessing validity:

We also get asked frequently what are some resources that we might be able to do. [...] There are also membership organizations that your institution may be a member of that evaluate the validity of high schools. I'm thinking including, for example, the NCAA. They've got a pretty rigorous process, although it's proprietary, they're not going to share that with us. But they might share it with their member organizations. Along with the college board and some other things like that. [Emphasis added.]¹⁵

Importantly, this endorsement of the College Board came in 2012 – after the Department had promulgated a new rule requiring institutions to develop and follow procedures to evaluate the validity of a high school diploma beginning in July 1, 2011. As discussed in Section IV below, the Department approved the Agreed Upon Procedures for the Finding 1 file review that allowed the College and the auditor to

¹² See Exhibit 1-E (NCES Listing of AWA and ASA).

¹³ See National Center for Education Statistics (NCES), "Characteristics of Private Schools in the United States: Results From the 2009-10 Private School Universe Survey," Introduction, page 1, available at <http://nces.ed.gov/pubs2011/2011339.pdf>.

¹⁴ See Exhibit 1-F (College Board listing).

¹⁵ See Transcript of "Another Look at the Student Eligibility Toolkit" (presented in November 2012), available at https://client.blueskybroadcast.com/fsa/2012/presentations/fsa12_33/trans/fsa12_33.pdf.

verify high school validity by checking to see if the high school was listed in the SAT College Board High School Code registry. Both ASA and AWA appear in the registry.

Fourth, the Department recently stated that another resource institutions can look to in order to evaluate whether a high school diploma is valid is to determine whether other institutions have accepted the diploma.¹⁶ Here, other local postsecondary institutions and public employers have readily accepted the ASA diploma. The College's owner contracted with individuals to seek enrollment at certain campuses within the Florida College System using their ASA diplomas to gain admission. Presenting an ASA diploma, these applicants were accepted by and able to register for classes at the Florida College System's Broward College and Indian River State College.¹⁷ The applicants also were provisionally accepted at Miami Dade College and Palm Beach State College – after the effective date of the rule requiring institutions to develop procedures to evaluate the validity of a student's high school completion.¹⁸ The acceptance at the latter colleges was provisional because the colleges also require an official transcript directly from ASA and other unrelated documentation, such as proof of Florida residency. None of these institutions stated that the ASA diploma was invalid.

Fifth, the Department recently stated that another resource institutions can look to in order to evaluate whether a high school diploma is valid is to determine whether the diploma would be accepted by certain employers that require a high school diploma in order to obtain employment (such as for state trooper positions).¹⁹ The College's owner communicated in 2012 with several local agencies in Florida and confirmed that

¹⁶ During a presentation, Carney McCullough of the Department of Education stated that the acceptance of diplomas by other postsecondary institutions is an indicator of validity. See Transcript of "Another Look at the Student Eligibility Toolkit" (presented in November 2012), available at https://client.blueskybroadcast.com/fsa/2012/presentations/fsa12_33/trans/fsa12_33.pdf ("Other institutions of higher education. As I pointed out, I know that there have been a lot of institutions – you know, y'all are a great resource for one another in terms of providing good information and feedback and sharing the information that all of you have. And that's just a great thing. So other institutions of higher education. You can usually reach out to your colleagues and find out if they're aware of a particular school. They may have more information about it than you do. So they're a good resource.").

¹⁷ See Exhibit I-G.

¹⁸ See Exhibit I-H.

¹⁹ During a presentation at the National Association of Student Financial Aid Administrators national conference in July 2012, Carney McCullough (Department of Education, Office of Postsecondary Education) explained to conference participants that one way schools could assess a diploma is by determining whether public agencies accept the diploma when reviewing applications for employment.

an ASA diploma is an acceptable high school diploma for the purpose of qualifying for employment with local agencies in Florida. For example, the Seminole County Sheriff's Office indicated that a diploma from ASA met agency standards.²⁰ So, education providers and employers also view ASA as a valid high school.

Sixth, a Department official issued a letter indicating that the law in effect during the file review did not prohibit AWA graduates from receiving Title IV funds. During the 2010 rulemaking process, the Principal of AWA wrote to the Department to convey that, amidst uncertainty caused by the proposed rule, some institutions were refusing to accept AWA diplomas. As noted in Section II above, the Department's Acting Deputy Assistant Secretary for Policy, Planning, and Innovation David Bergeron responded on July 30, 2010 that "eligibility criteria for admission [...] are determined by individual institutions" and "there is no Federal rule in place that would prohibit an AWA graduate that meets the student eligibility requirements under § 668.32 from receiving Federal student aid based on that standard."²¹ So, in the specific context of AWA, the Department indicated that while institutions may have different standards, the federal rules in effect during the 2009-2010 award year did not prohibit AWA graduates from receiving federal student aid.

Seventh, Finding 1 appears to contend that ASA is not a valid high school based on the conclusion of an Inspector General Agent for the Department of Education that, in December 2010 (after the file review period), he was told that ASA students do not take classes, that students can take a high school diploma exam, and can take the exam the same day as they apply to ASA. In addition to the reasons cited above, this conclusion does not justify the finding because the law does not prohibit the issuance of a high school diploma based on an examination.²² Applicable federal standards did not

²⁰ See Exhibit 1-I.

²¹ Letter from David Bergeron, Acting Deputy Assistant Secretary for Policy, Planning, and Innovation, U.S. Department of Education, to American Worldwide Academy (July 30, 2010). See Exhibit 1-A.

²² Moreover, the description of ASA's programs on its website indicates that ASA does not only issue diplomas based on the passage of an examination. The website indicates that its curriculum provides two ways for students to earn their high school diploma. First, the student can take an exam that tests the student's aptitude in the objectives necessary for graduation as specified by the State of Florida Department of Education. Second, the student can complete an online curriculum leading to a high school diploma. Students who opt to take the exam in order to obtain their high school diploma must pass the exam with a cumulative score of at least 70% and a score of at least 60% in each individual subject. Students who opt to enroll in online courses in order to obtain their high

define a high school diploma as a diploma received only after obtaining classroom instruction. There is also no Department rule that says a high school cannot issue a diploma on the basis of an exam that assesses student knowledge. Indeed, public schools in the state in which ASA and AWA operate (Florida) use exams to determine whether their students may graduate from high school. Even if a Florida public high school student attends high school for four years and passes each class, the student is required to pass the Florida Comprehensive Assessment Test (FCAT), a standardized exam that measures selected benchmarks in mathematics, reading, science, and writing from the Sunshine State Standards in order to receive a high school diploma.²³ Thus, Florida clearly believes that testing for specific knowledge is a valid method to determine whether a student has earned a high school diploma. According to ASA's website, the exam it uses to form the basis for the issuance of a high school diploma tests the same skills and competencies identified by the Florida Department of Education as necessary for graduation from a public high school.²⁴

Eighth, the Program Review Report contends that the state of Alabama does not recognize ASA as a valid high school.²⁵ The report does not provide any evidence to support this conclusion – i.e., evidence that the agency identifies ASA by name and determined that ASA is not a valid high school. Even if this assertion were correct, there are multiple entities that have reached the opposite conclusion as discussed in the previous paragraphs of this section. Most notably, the state in which ASA is located (Florida) lists ASA as a private school in its Directory and uses the Directory for state grant purposes. As also noted above, the Department's guidance suggests that one would look to the state in which the high school is located as opposed to the state in which the postsecondary institution is located. ASA is in Florida, not Alabama.

school diploma take courses ranging from five to twelve weeks. The student is required to pass all of the weekly objectives and earn a letter grade of C (70%) or above to pass the class. Each course is worth one credit. In order to graduate, students must complete 4 English courses, 3 Math courses, 3 Science courses, 3 Social Studies, 3 Religion, 1 Personal Health, and at least 7 electives. Lastly, when the student completes all courses, he or she is required to pass a final exam with a score of at least 70 percent to graduate. Exhibit I-J displays screenshots from 2011 and 2012; the ASA website continues to display this information.

²³ Fla. Stat. § 1003.43(10)(b).

²⁴ See <http://asadiploma.com/fast-track-program.htm>

²⁵ See footnote 28 for further discussion of the lack of a determination by Alabama regarding the ASA diploma.

For all of these reasons, the record demonstrates that, even if the College had been required by applicable law to confirm the validity of high schools, the diplomas from ASA and AWA constitute valid high school diplomas.

b. The documentation demonstrates that the students identified in Finding 1 did produce a high school diploma as required by the applicable regulation.

Finding 1 reviewed a sample of 40 students and concluded that five of those students "appeared" to have an invalid high school diploma (students 12, 14, 18, 21, and 30), or 12.5 percent of the sample. The Finding also added three students outside of the sample based on information that those students had attended ASA (students 13, 16, and 19).²⁶ The College respectfully disagrees with the Finding for all eight of these students for the following reasons:

- The College has copies of a high school diploma from the seven of the eight cited students.
- None of the diplomas contain facial indicia of invalidity.
 - The ASA diploma for Student #12 is available at Exhibit 1-K.
 - The ASA diploma for Student #13 is available at Exhibit 1-L.
 - The AWA diploma for Student #14 is available at Exhibit 1-M.
 - The ASA diploma for Student #16 is available at Exhibit 1-N.
 - A letter from a public high school regarding the graduation of Student #18 is available at Exhibit 1-O.
 - The ASA diploma for Student #19 is available at Exhibit 1-P.
 - The ASA diploma for Student #21 is available at Exhibit 1-Q.
 - The ASA diploma for Student #30 is available at Exhibit 1-R.
- For the reasons discussed above in Section III.a, the six ASA diplomas and the single AWA diploma in the Program Review Report sample constitute "high school diplomas" under the law.

²⁶ Finding 1 incorrectly lists diplomas as from "American Southeastern Academy." The diplomas for Students #12, #13, #16, #19, #21, and #30 are from "Atlantic Southeastern Academy" (ASA).

- The Finding contends that high school diplomas were received on or near the date of the student's enrollment. The Finding also suggests elsewhere that students were able to obtain high school diplomas through examination without attending courses and as early as the same day of enrollment in the high school. Yet, even if these students had received the diplomas through passage of an examination rather than after classroom instruction (see text accompanying footnote 22),²⁷ the law did not prohibit the recognition of a high school diploma issued based on an examination, nor require completion of classroom instruction to receive the diploma. See Section III.a above. Moreover, as also discussed in Section III.a., there was ample information available in sources recommended by Department publications and personnel demonstrating that ASA and AWA were valid high schools. As conceded by the Finding, the College did possess diplomas for each of these students from these schools. As explained in Section III.a, no applicable law states or suggests that a high school cannot issue a diploma on the basis of competencies or exams that assess student knowledge.
- With respect to three of the students, the Program Review Report concedes that the students received high school diplomas from ASA, but appears to suggest that the diplomas should be deemed invalid because the "State of Alabama" allegedly concluded that ASA was not a valid high school. We disagree with this assertion,²⁸ but also note that it is inapplicable here. Alabama does not have jurisdiction over private schools in other states (such as ASA, which is a high school in Florida). Nor does Alabama publish a list of "unrecognized schools" or

²⁷ Likewise, the Department's insinuation that dates on internal forms suggest that the ASA and AWA diplomas were attained after the postsecondary start date is not necessarily supported by fact. Private high schools such as ASA and AWA typically withhold diplomas for nonpayment of tuition and fees. The dates appearing on their high school diplomas may represent the date of final payment. Thus, the high school diplomas may display a "graduation date" that postdates the actual completion of secondary requirements.

²⁸ We disagree for several reasons. First, the State of Alabama has not concluded that ASA is an invalid high school. Rather, the three students sought a license from the Alabama Board of Cosmetology. That Board also does not have a standard stating that "ASA" is an invalid high school; rather, it had a standard requiring a licensure candidate to have completed the equivalent of the tenth grade. Second, the Board had a brochure relevant to apprentice cosmetologists and not prospective cosmetologists who obtain training from a licensed cosmetology school, that said it did not recognize online high schools. The brochure was not applicable to Fortis College and the statement in the brochure was not supported by any law or regulation. Third, the State of Alabama does not publish a list of unrecognized schools, so the State itself had not taken a position on the validity of ASA's diploma. These points are not technical points: they refute the notion that Alabama had determined the ASA diploma was invalid or that the College should have known such a determination was made.

"diploma mills." As noted above, the school's home state (Florida) does list the school in a directory used by the state for financial aid purposes.

- With respect to three of the students, the finding notes that the students provided transcripts or an application indicating prior attendance at a high school (students 13, 16, and 18). Yet, the finding also concedes that the College obtained from two of the students proof of high school graduation from a subsequent high school, ASA. Accordingly, the College did not accept the attendance at a prior high school as a high school diploma. To the extent that the finding is questioning ASA high school diplomas that may have been earned through examination, that topic already has been addressed above (see text accompanying footnote 22). To the extent that the finding is questioning ASA high school diplomas in general, that topic also has been addressed above (see Section III.a).
- With respect to two of the students, the finding notes that the student's student profile application indicated graduation from another high school (students 12 and 14). Although the Department's guidance at that time would have allowed the College to consider accepting these self-certifications of high school graduation, the College did not accept them. As the finding concedes, the students did provide high school diplomas from ASA and AWA. To the extent that the finding is questioning high school diplomas that may have been earned through examination, that topic already has been addressed above (see text accompanying footnote 22). To the extent that the finding is questioning ASA and AWA high school diplomas in general, that topic also has been addressed above (see Section III.a).
- With respect to one student (Student #18), the file contained a Mississippi Permanent Record that states the student attended Pascagoula High School. There was also a letter in the student's file from the high school stating the student had completed all the requirements of high school, and while there is no graduation date evident, the letter stated that "he will receive his official diploma in May, but he is eligible to begin college effective immediately as per school and state policy." The College does not concede that it is liable merely because of

the absence of additional documentation in the file. The fact that only one file in the Program Review sample was missing a valid high school diploma demonstrates the absence of material noncompliance for this finding. Moreover, the College has received a letter from Pascagoula High School confirming that the student graduated from high school. See Exhibit 1-O.

For all of these reasons, the College respectfully disagrees with the findings associated with the students cited in Finding 1 and requests that the finding be closed without further requirement of the College.

IV. The Results of the College's Full File Review and the Attestation Report of an Independent Certified Public Accountant Reinforce the College's Material Compliance with the Applicable Law in Finding 1

The Program Review Report required the institution to perform a full file review for all 2009-2010 Title IV recipients admitted to the institution and to report the results in a spreadsheet containing the columns listed on page 7 of the Report. The Report also required the College to engage an independent public accountant to test the accuracy and completeness of the file review. Although it did not agree with the file review requirement, the College conducted and completed the required file review and spreadsheet (Exhibit 1-S). The College also engaged the independent certified public accounting firm of Case Sabatini to conduct the attestation. As required by Finding 1, Case Sabatini used a set of procedures that were pre-screened and approved by the Department (Exhibit 1-T) and issued its final report attesting to the file review results (Exhibit 1-U).

Both the College and, as reflected in its report, the independent accounting firm used the Agreed Upon Procedures for reviewing the validity of high school diplomas. As noted in Exhibit 1-U, the review of high school diplomas consisted of the following:

- Examination of the credential which documented each student's status as a high school graduate or its equivalent, and verification that its form (high school diploma/transcript or GED certificate) and the issuer's name (name of high school or "GED") were accurately described in the Institution's File Review List, without exception. Also, examination of the document for indications that it may be a falsified document.

- Comparison of the high school or GED information which appeared on each student's admission applications and, if applicable, their interview forms, to the document in the student's file which documented that they were the equivalent of a high school graduate. Comparison of the student's date of enrollment in the College and the date on the high school graduation or GED document. Verification that the College's File Review List included explanations for discrepant information.
- Application of the following criteria to determine validity:
 - If the high school is located in a foreign country, and the translated diploma is evaluated to be the equivalent of a U.S. high school diploma, it was accepted as valid.
 - If the high school is operated by a state, county, or local government entity, it was accepted as valid.
 - If the high school is private and is regulated by the state in which it is located, it was accepted as valid.
 - If the high school is private and not regulated by the state in which it is located, and the high school appears in any of the following directories of secondary schools, it was accepted as valid: the Private School Universe Survey published by the U.S. Department of Education's National Center for Education Statistics, the SAT College Board High School Code registry, or the ACT High School Code registry.
 - If the high school did not satisfy one of the earlier defined indicia of validity, and the Institution enrolled at least ten students from the high school, it was deemed invalid if the high school requires no training or examination.

The independent auditor also was to verify that each high school that did not meet the indicia for validity as explained in the Agreed Upon Procedures had also been marked by the school as "invalid" on the file review spreadsheet.

As required by the Program Review Report, the file review spreadsheet contains a column entitled "High School Diploma (Yes/No)". However, the College does not concede that any of the "No" entries constitutes an admission that the student lacked a

valid high school diploma. As explained in Section II, during the 2009-2010 award year, the Department did not place any obligation on institutions to independently determine the validity of individual high schools. The Department did not adopt such a regulation until after the file review period. The College conducted the file review and examined the validity of high school diplomas in accordance with the procedures agreed to with the Department only for the purpose of cooperating with the program review process. The Agreed Upon Procedures impose standards that were not contained in the regulations during the file review period and, therefore, that the College was not required to follow at that time. Accordingly, the file review results do not provide a basis for noncompliance, nor do the Title IV funds listed in the spreadsheet constitute a basis for the assessment of liabilities.

Yet, even under the Agreed Upon Procedures that imposed requirements beyond those existing under law during the 2009-10 award year, the file review results identified only limited instances of potential invalidity:

- The College identified eleven diplomas from a high school named Southern Region Christian Academy. The College does not concede that the high school is invalid, but at the time of the file review was not able to find information regarding this high school's provision of training or examinations. The College cannot rule out the possibility that such information may have been available during the 2009-10 award year, but instead chose to treat the school as invalid under the standards of the Agreed Upon Procedures. There were 11 students who received high school diplomas from this institution, and they have been classified as "No" in the "High School Diploma (Yes/No)" column.
- The College has identified four isolated instances in which it was unable to locate at the time of the file review the student's proof of graduation from high school which had been collected three award years earlier. Although the College does not have evidence suggesting that these students graduated from an invalid high school, the College classified them as invalid at this time for purposes of the file review. These four students have been classified as "No" in the "High School Diploma (Yes/No)" column.

- The College has deemed one Jefferson Davis High School diploma to be possibly invalid because of discrepancies between the diploma and other diplomas issued by the school. The College does not concede that the diploma is invalid, but has classified this one diploma as invalid for purposes of the file review under the Agreed Upon Procedures. This student has been classified as "No" in the "High School Diploma (Yes/No)" column.
- The College has deemed two diplomas to be possibly invalid because they are not fully legible. Although the College does not have evidence suggesting that these students graduated from an invalid high school, the College classified them as invalid at this time for purposes of the file review. These two students have been classified as "No" in the "High School Diploma (Yes/No)" column.
- The College has deemed two diplomas from Jefferson High School and one diploma from Stratford Career Institute to be possibly invalid due to research performed about the schools. For the reasons discussed above and in Section II, the College does not concede that this diploma was invalid under law in effect during the file review, but classified it as invalid for the purpose of the file review under the Agreed Upon Procedures. These three students have been classified as "No" in the "High School Diploma (Yes/No)" column.

These file review results were attested to by the independent accounting firm, Case Sabatini. Specifically, Case Sabatini applied the Agreed Upon Procedures described above to a statistically valid sample of 328 students. As stated in the "Independent Accountant's Report on Applying Agreed-Upon Procedures," the engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. In total, Case Sabatini found that five student files did not have acceptable documentation of high school graduation or its equivalent and found that two high schools did not fulfill the agreed-upon "validity" criteria. Case Sabatini also verified that the file review spreadsheet identified as "invalid" each file which had been questioned by the auditor and further noted that the College had identified other files (i.e., files not sampled by the auditor) as "invalid" in the file review spreadsheet. (For this reason, the number of students cited in the Case Sabatini report is smaller than the number in the College's spreadsheet: some of the

students cited in the College's spreadsheet were not included in the auditor's 328-student sample.) The independent auditor did not classify ASA or AWA as "invalid" high schools based upon the standards cited in the Agreed Upon Procedures.

In short, although the record did not support the imposition of a file review requirement, the College conducted the required file review in order to cooperate with the program review process. The College conducted the file review in accordance with procedures agreed to by the Department and had the results attested to by an independent certified public accounting firm. The file review confirmed the eligibility of the eight students cited in Finding 1 and all students who attended ASA and AWA. Moreover, the file review identified only isolated instances of currently missing high school diplomas (four students) and students who attended three schools for which the College could not currently confirm validity under the Agreed Upon Procedures. The College does not concede that these students constitute instances of noncompliance under the law in effect during the file review; instead, the results demonstrate the absence of material noncompliance for this finding.

V. The College Already Has Implemented Procedures to Ensure Validity of High School Diplomas Under The Law Adopted After The File Review Period

As the Department is aware, the College already has complied with Finding 1's request that the College "implement procedures to ensure the validity of high school diplomas before students are admitted and disbursed Title IV funds." We note that the file review period for Finding 1 covered the 2009-2010 award year. As discussed in Section II, the Department adopted a regulation that took effect on July 1, 2011 and required institutions to "[d]evelop[] and follow[] procedures to evaluate the validity of a student's high school completion if the institution or the Secretary has reason to believe that the high school diploma is not valid."²⁹ As discussed in Section I, the College proactively adopted procedures in May 2010 designed to comply with this new requirement well in advance of its effective date. These procedures adopted by the College over three years ago comply with the Finding's request for procedures.

²⁹ 34 C.F.R. § 668.16(p).

Specifically, as of May 2010, the College began accepting only those high school diplomas issued by public high schools, by private traditional high schools, or by online high schools accredited by an accrediting agency recognized by the U.S. Department of Education.³⁰ This decision was motivated by the uncertainty evident during negotiated rulemaking regarding the Department's developing position regarding the validity of individual high school diplomas and by the Department's unwillingness to provide institutions with a list of acceptable or unacceptable high schools. The College's policy goes above and beyond the requirements of the new Department rule by accepting high school diplomas only from all private high schools that demonstrate accreditation by a Department-recognized accrediting agency even though the Department does not prohibit reliance on diplomas from unaccredited high schools. See 2012-2013 Federal Student Aid Handbook, Vol. 1, p. 1-6 ("Note also that diplomas from unaccredited high schools can be valid and qualify students to receive FSA funds as well as to meet college admissions standards."). Accordingly, the College has long-standing policies in place that satisfy the policy requirement of Finding 1 and the applicable law that took effect for the first time on July 1, 2011.

VI. Conclusion

For the reasons discussed above, Finding 1 should be closed without further requirements of the College. The Department's law in effect during the file review period did not define a "valid" high school diploma and placed no affirmative obligation on institutions to independently determine the validity of individual high schools. When it finally did impose such a rule, the Department stated that it would not apply that rule retroactively. The College adopted policies prior to the effective date to comply with the new regulation and those policies remain in effect today. The required attestation, conducted in accordance with the Agreed Upon Procedures, supports the College's position.

³⁰ Exhibit 1-V ("Fortis Compliance Procedure #59"). Page 6 of the Program Review Report states that "[w]hen asked about the legitimacy of the ASA and AWA high school diplomas, the Financial Aid Director stated that FC stopped accepting these diplomas and all other online diplomas due to suspecting that these were not valid." The Financial Aid Director was likely referring to the policy change implemented in May 2010. However, the College did not make a determination at that time that any particular online or other non-traditional (i.e., non classroom based) high schools were invalid.

Finding 2: Pell Overpayment / Underpayment

The review team, after considering the additional information provided by the College in its response letters to the Department on April 3, 2013, identified two (2) instances in the forty-three (43) Pell Grant recipient records examined where there were Pell Grant disbursement errors. In the Department's Report of February 7, 2013, twelve instances were initially identified; however, the College was able to resolve ten of the twelve initial instances to the satisfaction of the Department, thus resulting in just under a 5% error rate. The following are the specific circumstance for each of two (2) remaining instances of Pell Grant overpayments identified by the review team for the 2008-2009 award year:

Student 2, (b)(6); (b)(7)(C) was enrolled in a Medical Assistant diploma program as a full-time student. Her first academic year consisted of three standard ten-week quarters. She began her fourth quarter on 3/23/09 and was enrolled as a $\frac{3}{4}$ time student. This student deviated from the normal full-time schedule because of a change in her program of study which took place starting with her November 24, 2008 term. The student officially withdrew from the College on 3/31/09. The College had incorrectly disbursed a full-time Pell Grant on 4/1/09. The error was identified and corrected during the Pell recalculation on 4/6/09. The student had only attempted one course, "Simulating the Medical Office," a 2 FA quarter credit course. A Pell recalculation and an R2T4 were completed. The Pell recalculation reduced the Pell to the less-than-half time amount of \$394. The R2T4 calculation also required a refund of the Pell Grant unearned by the student. The total Pell Recalculation and R2T4 Pell refund of \$1,554 was completed on 4/6/09. The initial full-time Pell Grant disbursement was in error, but the ineligible portion was refunded with the Pell recalculation within 5 days of the disbursement, so there was no remaining over/under payment of the student's Pell Grant.

Student 10, (b)(6); (b)(7)(C) was enrolled in the Medical Assistant program as an evening student and began classes on 10/20/08. She began her first quarter 10/20/08 with 8 FA credits and was paid a part-time Pell Grant of \$788 on 11/3/08. She began her second quarter on 1/12/09 and was paid a part-time Pell Grant of \$789 on 1/12/09. She began her third quarter on 3/23/09 and completed 10 FA credits. She was paid \$788 as a part-time Pell Grant on 3/25/09. She began her fourth quarter on 6/1/09 with 12 FA credits and was paid a part-time Pell Grant of \$788 on 6/8/09. She began a fifth quarter on 8/10/09 and was paid \$1783, a full-time Pell Grant from the 09-10 award year on 8/26/09; however, she only attempted 6 credits in her fifth quarter before she withdrew on 9/4/09. A Pell Grant recalculation was completed, but the refund of \$891 was incorrectly made to 08-09 Pell on 9/17/09.

Based on the above facts, this student should have received 08-09 Pell Grant for quarters 1 through 4 totaling \$4339, and 09-10 Pell grant of \$892 for the final quarter

[state why]. The student received \$2656 in 08-09 Pell Grant funding. The College provided \$2075 in an institutional scholarship in order to hold the student harmless for the 08-09 Pell Grant funds that should have been disbursed. As a result of the Department's Report the College also corrected its recalculation error with an institutional scholarship to the student's account in the amount of \$891 on 9/11/12. The College also made the correct refund to 09-10 on 9/11/12, but the 09-10 refund was late. An additional Pell Grant disbursement from 08-09 of \$393 [state why] was made on 9/24/09. The College also provided an institutional credit of \$1184 in place of the 08-09 Pell Grant on 9/11/12.

Fortis College agrees with the amended finding and provides its further response below.

Response:

The College recognizes the importance of consistent adherence to the Department's Rules, Regulations, FSA Handbook and Dear Colleague letters, specifically as they pertain to determining the eligibility and disbursement requirements for Pell Grants. The College's staff who are responsible for awarding, recalculating and posting Pell Grants have been made aware of the errors identified in this finding and the staff were provided with additional training on the procedures required by the Department. In addition, internal review procedures have been implemented where the senior financial aid staff review Pell amounts to be certain that they coincide with the correct version of the student's ISIR and/or the student's correct enrollment status. If any changes are made to the ISIR or enrollment status that will result in a change to the Pell award, those adjustments will be made in a timely fashion. Emphasis in the additional staff training was placed on academic changes to the number of credit hours attempted after the initial Pell Grant disbursement has been made for the payment period and the importance of adjusting Grants and making refunds or additional disbursements in a timely fashion. The College believes that its training along with adherence to established procedures will ensure Pell Grants are properly recalculated upon withdrawal. Attached please find the College's current Pell Grant Disbursement Policy (See Exhibit 2-A.)

The College performed the requested file review of all Pell Grant disbursements for 2008-2009 Award Year in accordance with the April 15, 2013 letter from Chris Miller. The results of the file review were provided to the College's IPA and the IPA performed his Attestation to the accuracy of the results of the file review. The results of the required file review in an Excel spreadsheet have been sent to you electronically as an encrypted and password protected WinZip file. Attached to this letter is our IPA's Attestation to the accuracy of the required file review. (See Exhibit 2-B.)

The following is a summary of the results of the file review:

Award Year	Unduplicated Recipients By Award Year	Total Net Disbursements	Amount of Underawards	Error Rate %	Amount of Overawards	Error Rate %
2008-2009 ³¹	1347	\$3,633,276	\$55,674	6%	\$49,161	6%

The following is a summary of the actions taken with regard to each of the Pell Grant underpayment or overpayment identified in the amended finding:

Student 2: (b)(6); (b)(7)(C) No additional corrective action was required.

Student 10: (b)(6); (b)(7)(C) No additional corrective action was required.

Finding 3: Return to Title IV Not Correctly Calculated

This finding initially cited six instances of Return to Title IV (R2T4) calculation errors. After considering the additional information provided by the College in its response letter to the Department of April 3, 2013, the review team agreed in its letter of April 15th that there were no remaining instances in its sample of forty-three (43) records examined that reflected Return to Title IV (R2T4) calculation errors. Therefore, no full file review is required according to the April 15, 2013 letter from Chris Miller.

Fortis College agrees with the amended finding and provides its further response below.

Response:

No further action required by the college in response to this finding.

Attached is a copy of the College's R2T4 policy and procedures. (See Exhibit 3-A.)

³¹ The amounts and totals listed exclude all students indicated in Appendix A of the Program Review Report dated 1/22/13 for the applicable award years.

Finding 4: Financial Aid Packaged Incorrectly / Full Eligibility Not Awarded

The review team stated in their Report that the College limited the amount of Federal student loan funds to the amount needed by the student for his/her direct costs of tuition and fees rather than awarding the maximum amount of loan eligibility up to the student's Cost of Attendance (COA). In addition, the Report states that the College failed to provide adequate financial aid counseling to students which resulted in students not being made aware of the full Federal Direct Loan amount for which they were eligible to receive. The student's award letters did not display student's full eligibility of direct loans.

The review team noted in their Report that the financial aid staff interviewed told the review team that the college's policies and practices regarding loan counseling procedures and loan awards had changed and certain procedures found to be objectionable by the Review team had been revised or eliminated.

Fortis College agrees in part with the concerns detailed in the finding and provides its further response below.

Response:

The College has made significant changes in its policies and practices regarding loan counseling for new and continuing students over the five years (2008-2009 to 2012-2013 award years) included in the reviewers assessment. These changes follow the shifting guidance from the Department of Education, which has at times required schools to automatically package individual students at their maximum loan amount even if the relevant financial aid professional would strongly advise a student against borrowing that amount of funding.

The College believes that its current practices are consistent with the Department's current initiative to provide students and their parents a full set of consumer information which will allow the students and their parents to make educated decisions on the availability of student loans, options for borrowing, deciding how much to borrow and the repayment consequences of borrowing. Of specific note is the fact that the Department of Education provided guidance in a Dear Colleague letter issued on January 30, 2013 (GEN-13-05) regarding the Financial Aid Shopping Sheet, which the College adopted on July 1, 2013. The guidance found in GEN-13-05 encourages colleges to recommend less than the maximum loan amount if consistent with the student's circumstances; however, at the same time ensuring that student and parents of dependent students are clearly informed of their maximum eligibility to borrow under the Federal Direct Loan programs for each award period.

The practices of the College's students' borrowing over the past five years have evolved as evidenced by the amount of credit balance refunds made to students ("Stipends"). A credit balance refund is generally caused when a student borrower elects to borrow FDL Subsidized and Unsubsidized loans and/or the dependent student's parent borrows

PLUS loans in excess of what is needed to pay his or her tuition, books and fee charges.

The following chart and attached exhibits document the change in the borrowing levels of the College's students and also reflect the changes in the College's loan counseling practices based on private and published guidance issued by the Department:

Award Year	Net Title IV Disbursed	Stipends Disbursed	Percentage of Stipends [Credit Balance Refunds]	Exhibits
2008-2009	\$8,222,080	\$2,508	00.3%	4-A
2009-2010	\$14,222,413	\$26,633	00.2%	4-B
2010-2011	\$16,153,596	\$335,854	02%	4-C
2011-2012	\$21,571,241	\$2,102,492	09.7%	4-D
2012 - 2013	\$20,833,074	\$1,561,165	07.5%	4-E

The College believes that in the context of the national dialogue on the exploding student loan debt, which has now topped \$1.1 trillion, paired with current interest rates for new loans at 3.6% for subsidized loans and unsubsidized loans for undergraduate students, 5.4% for unsubsidized loans for graduate students, and 6.4% for PLUS loans³² and with total student loan debt exceeding all other forms of consumer debt, that all postsecondary institutions, including Fortis College, have a moral obligation to provide students with clearly presented options in terms of borrowing the absolute minimum for college expenses. The College believes it must offer options to our students and parents in terms of minimizing the amount of interest-bearing and long-term debt each individual student and parent needs to accumulate in order to achieve the student's educational objective. In this vein, the College offers interest-free, in-school monthly payment plans which provide many of our students and parents an opportunity to minimize long term debt and unnecessary interest expense.

The College continues to maintain procedures under which it strongly encourages students to limit their discretionary borrowings in order to minimize student debt upon graduation while at the same time, advising students of their maximum annual loan eligibility. The College believes that this approach is appropriate for our student body of low-income adults who are generally not accustomed to incurring and repaying large

³² On August 9, 2013, the President signed into law H.R. 1911, *Bipartisan Student Loan Certainty Act of 2013*, which is retroactive to July 1, 2013.

amounts of debt. Excess student borrowing is also a significant concern of the President, Congress, the Secretary, NASFAA and student consumer groups. The College believes it is appropriate to do everything within its means to counsel students to incur the minimal amount of debt necessary to pay for their education.

The College also recognizes that its practices from three years ago could be viewed as restrictive because the College did not routinely assume students would obtain the maximum amount of their loan eligibility and instead recommended loan amounts that were consistent with meeting the students' direct cost of education. Fortis College intended for students to be able to seek additional funding as needed. However, the College also recognizes that the Department does not believe that the College's past practices and procedures were adequate. We believe the above chart clearly demonstrates the change in the College's practices starting in the 2011-2012 award year where the College was originating Direct Loans for amounts that exceeded the direct tuition and fees costs.

As noted previously, starting on July 1, 2013, the College's presentation to parents and students includes the 2013- 2014 Consumer Information Guide (See Exhibit 4-H.) and three examples of the "Shopping Sheet. (See Exhibits 4-I, 4-J & 4-K.) [Exhibits 4-I, 4-J and 4-K are similar except for a larger tuition costs. What if you packaged less than the maximum? What would the Financial Aid Shopping Sheet look like?]

In addition, in the event that a student does not initially borrow the maximum amount for an award year, the College's procedures ensure that any subsequent requests by the student will be processed in a timely fashion. The College has revised its loan counseling, loan packaging and supplemental loan borrowing procedures. (See Exhibits 4-F & 4-G.)

Finding 5: Federal Work Study Violations – Improper Payment to Students / Improper Hours on Time Sheet

The review team identified three instances in the Federal Work Study records examined where the wages paid did not correspond to the hours worked as documented on the students' time sheets. The following are the specific deficiencies identified by the reviewers for three students:

Student 10: (b)(6); (b)(7)(C) (2008-2009), Montgomery Campus Student - For the pay period 4/1/09 to 4/15/09, the student was paid for 55 hours at \$9 per hour; however, according to the student's time sheet, the student only worked a total of 45 hours. The student was apparently paid for 10 hours more than was documented on her time sheet. This apparent error caused the student to receive \$90.00 more in the two-week pay period than was documented on her time sheet.

Student 23: (b)(6); (b)(7)(C) (2009-2010) Mobile Campus Student – There was no timesheet for this former student for the pay period of 6/9/2010 to 6/22/2010. The student was paid 32 hours for the period based on an email dated 6/24/2010.

Student 42: (b)(6); (b)(7)(C) (2011-12) Mobile Campus Student – For the pay period 10/8/2011 to 10/22/2011, the student was paid for 12.00 hours at \$11.00 per hour; however, according to the student's time sheet, the student only worked a total of 10.77 hours. The student was paid for 1.23 hours more than was documented on her time sheet. This apparent error caused the student to receive \$13.53 more in the two-week pay period than was documented on her time sheet.

Fortis College agrees in part with the concerns identified in the finding and provides its further response below.

Response:

The College recognizes the importance of adherence to the Department's FSA Handbook recommendations and guidance in its management of the Federal Work Study (FWS) program. Attached please find a copy of the College's revised procedures for recording hours worked. (See Exhibit 5-A.)

The following is the College's response to each of the payroll concerns for the former FWS students listed above.

Student 10: (b)(6); (b)(7)(C) (2008–2009) Montgomery Campus. The former student turned in her payroll time sheets late for the pay period ending on 3/31/2009; therefore, the 10 hours not paid were added to the next two-week pay period when 45 hours were earned. The total amount earned over the four-week period (3/15/2009–4/15/2009) was 55 hours. (See Exhibit 5-B.) This total payment was accurate.

Student 23: (b)(6); (b)(7)(C) (2009-2010) Mobile Campus. The supervisor for this FWS student employee e-mailed confirmation of the total student's hours for payroll because she did not have the student's time sheet for the pay period 6/9/10–6/22/11 (See Exhibit 5-C.) We have searched our records and cannot locate a properly completed time sheet to document the 32 hours in FWS wages paid. The gross wages paid Cheryl Woodruff for the pay period were \$352.00. The 75% Federal share of the wages paid was \$264. The Federal share of the wages paid has been refunded to FWS 2009-2010. (See Exhibits 5-E & F.)

Student 42: (b)(6); (b)(7)(C) (2011–2012) Mobile Campus. The hours added on the timesheet for this former student were incorrectly calculated for the pay period 10/8/11 to 10/22/11. 12 hours 1 minute was calculated as the total hours on the bottom of the timesheet, but the student actually worked from 3:30 to 6:30 on 10/18/11 (3 hours), from 2:20 to 6:00 on 10/19/11 (3 hours 40 minutes) and from 1:24 to 5:30 on

10/20/11 (4 hours 6 minutes) for a total of 10 hours 46 minutes (See Exhibit 5-D). The student should have been paid \$118.43 (at \$11.00 per hour); however, she was paid \$132.00. The gross overpayment of wages for the pay period was \$13.57. The 75% Federal share of the wages paid was \$10.18. Federal share of the wages paid have been refunded to FWS 2009-2010. (See Exhibits 5-E & F.)

The total refund for \$254 (b)(6); (b)(7)(C) and \$10.18 (b)(6); (b)(7)(C) total \$264.18, yet \$274.18 was refunded per Exhibit 5-E. I believe (b)(6); (b)(7)(C) refund is \$264 and not \$254. Then the total of \$274.18 would be correct.

As noted by the email, there should be an explanation as to why FWS funds are being returned into what appears to be the Pell account in Exhibit 5-F.

Finding 6: Federal Work Study Job Descriptions Incomplete

The review team identified six instances in the Federal Work Study records where the job descriptions did not contain all of the components recommended by the Department in its 2011-2012 FSA Handbook, Volume 6, page 6-18. The following are the specific deficiencies identified by the reviewers for the six students:

Student 7: (b)(6); (b)(7)(C) (2008-2009), Mobile Campus Student – Address of the employer, purpose of the job, the wage rate or range, the length of the student's employment and the name of the supervisor for the job.

Student 10: (b)(6); (b)(7)(C) (2008-2009), Montgomery Campus - Address of the employer, purpose of the job, the wage rate or range, the length of the student's employment and the name of the supervisor for the job.

Student 22: (b)(6); (b)(7)(C) (2009-2010) Montgomery Campus - Address of the employer, purpose of the job, the wage rate or range, the length of the student's employment and the name of the supervisor for the job

Student 23: (b)(6); (b)(7)(C) (2009-2010), Mobile Campus Student –Purpose of the job, the wage rate or range, the length of the student's employment and the name of the supervisor for the job.

Student 42: (b)(6); (b)(7)(C) (2008-2009), Mobile Campus Student – Address of the employer, purpose of the job, the wage rate or range, the length of the student's employment and the name of the supervisor for the job.

Student 22: (b)(6); (b)(7)(C) (2011-2012) Montgomery Campus - Address of the employer, purpose of the job, the wage rate or range, the length of the student's employment and the name of the supervisor for the job.

Fortis College agrees with the concerns identified in the finding and provides its further response below.

Response:

The College recognizes the importance of adherence to the Department's FSA Handbook recommendations and guidance in its management of the Federal Work Study (FWS) program. The College has revised its Position Description template to conform to the components and guidance described in Chapter 2 of the FSA 2012-13 Handbook, pages 6-43 to 6-44. (See Exhibits 6-A & 6-B.)

The following is the requested information for each of the former FWS students listed in the Program Review Report:

Student 7: (b)(6); (b)(7)(C) (2008 - 2009), Mobile Campus Student

- Address of the employer: Fortis College, 3590 Pleasant Valley Road, Mobile
- Purpose of the job: Tutoring
- Wage rate or range: \$10.00 per hour
- Length of the student's employment: 9 months
- Name of the supervisor for the job: Ms. Morrisha Williams

Student 10: (b)(6); (b)(7)(C) (2008 - 2009), Montgomery Campus

- Address of the employer: Fortis College, 3736 Atlanta Hwy, Montgomery.
- Purpose of the job: Support services for instructional and student services staff
- Wage rate or range: \$9.00 per hour
- Length of the student's employment: March 30, 2009 – May 29, 2009
- Name of the supervisor for the job: Mr. John Albrecht

Student 22: (b)(6); (b)(7)(C) (2009-2010) Montgomery Campus

- Address of the employer: Fortis College, 3736 Atlanta Hwy, Montgomery
- Purpose of the job: Tutoring
- Wage rate or range: \$13.00 per hour
- Length of the student's employment: June 2010-July 2010
- Name of the supervisor for the job: Ms. Morrisha Williams

Student 23: (b)(6); (b)(7)(C) (2009-2010), Mobile Campus Student

- Address of the employer: Fortis College, 3736 Atlanta Hwy, Montgomery
- Purpose of the job: Tutoring
- Wage rate or range: \$11.00 per hour
- Length of the student's employment: 9 months
- Name of the supervisor for the job: Ms. Morrisha Williams

Student 42: (b)(6); (b)(7)(C) (2011-2012), Mobile Campus Student

- Address of the employer: Fortis College, 3590 Pleasant Valley Rd, Mobile
- Purpose of the job: Support Services in Financial Aid Office
- Wage rate or range: \$11.00 per hour
- Length of the student's employment: 9 months

- Name of the supervisor for the job: Ms. Tiffany Williams

Student 22: (b)(6); (b)(7)(C) (2011-2012) Montgomery Campus

- Address of the employer: Fortis College-Montgomery, 3736 Atlanta Hwy Montgomery, AL 36109
- Purpose of the job: Support services for student services administrative staff
- Wage rate or range: \$7.25 per hour
- Length of the student's employment: January 7, 2012 – June 6, 2013
- Name of the supervisor for the job: Ms. Karla Smilie & Ms. Amelia Farrior

Finding 7: Federal Work Study Violations - Students Working During Class Hours

The review team identified five instances where the College did not adequately monitor FWS time sheets and FWS students worked at the same time as the students were scheduled to be in class. The following is an overview of the deficiencies identified by the reviewers for five former students:

Student 7: (b)(6); (b)(7)(C) [2008-2009] Mobile Campus. On Thursday, April 16, 2009, the student reported that she worked at her FWS job during the same time as her class was scheduled. Specifically, her time record indicates that she worked from 12:00 PM to 5:30 PM on 4/16/09; however, she was scheduled for class that day from 8:10 AM to 2:25 PM. Accordingly the former student was paid FWS wages of \$24.10 for 2.41 hours of time that she was scheduled for class.

Student 10: (b)(6); (b)(7)(C) [2008-2009] Montgomery Campus. The student reported that she worked at her FWS job during the same time as her classes were scheduled. Specifically, her time record indicates that she worked from 2:15 PM to on 9:15 PM on 5/21/13 and 2:15 PM to 6:15 PM on the other three dates; however, she was scheduled for class on each day from 5:50 PM to 9:50 PM each day. Therefore, the student was paid \$41.94 for 4.66 hours that she was scheduled to be in class.

Student 33: (b)(6); (b)(7)(C) [2010-2011] Mobile Campus. Over the period from 3/1/10 to 6/14/10, the student reported that he worked 11.36 hours at his FWS job during the same time as his class was scheduled. The specific dates and times were detailed in Appendix C of the Program Review Report. In summary, there were 34 occurrences and each occurrence was approximately 20 minutes.

Student 42: (b)(6); (b)(7)(C) [2011-2012] Mobile Campus. The student reported that she worked at her FWS job and was paid FWS wages during the same time as her class was scheduled. The specific dates and times were not provided in the finding.

Student 43: (b)(6); (b)(7)(C) [2011-2012] Montgomery Campus. The student reported that he worked at her FWS job and was paid FWS wages during the same time as her class was scheduled. The specific dates and times were not provided in the finding.

Fortis College generally agrees with the concerns identified in the finding and provides its further response below.

Response:

The College recognizes the importance of adherence to the Department's rules and regulations as they pertain to the payment of federal Work Study wages and the importance of both scheduling students to work only at times when their classes are not scheduled and carefully monitoring FWS time records to ensure that student are not reporting time worked at their FWS position when they are scheduled for class. Attached is a copy of the College's FWS payroll procedures. (See Exhibit 7-A.) The financial staff responsible for the FWS program have been given additional training on how to monitor student time records to ensure that there is no conflict with student's class schedule.

The College performed the required full file review for all 2008-2009 and 2011-2012 Federal Work Study recipients. The file review included all recipients except those included in Appendix A of this Program review Report. The results of the file review were provided to the College's IPA and the IPA performed his Attestation to the accuracy of the results of the file review. The results of the required file review in an Excel spreadsheet have been sent to you electronically as an encrypted and password protected WinZip file. Attached to this letter is our IPA's Attestation to the accuracy of the required file review. (See Exhibit 7-B.)

The following is a summary of the results of the file review:

Award Year	Unduplicated Recipients By Award Year	Total Federal Portion of Disbursements	Federal Amount Paid while Scheduled for Class	Error Rate %
2008 - 2009	47	\$63,794	\$771	1.2%
2011 - 2012	31	\$36,786	\$1,391	3.8%
TOTAL³³	78	\$100,580	\$2,162	2.1%

³³ The amounts and totals listed exclude all students indicated in Appendix A of the Program Review Report dated 2/7/13 for the applicable award years.

The following is a summary of the corrective actions taken with regard to the five students identified in the program review report:

Student 7: (b)(6); (b)(7)(C) [2008-2009] The College generally agrees with the finding, but not all the details of the finding as presented in the Report. According to the student's timesheets and pay record, the student was paid \$16.88 for hours worked while scheduled for class. This amount only includes the federal portion of the liability. [See Exhibit 7-C.]

Student 10: (b)(6); (b)(7)(C) [2008-2009] The College generally agrees with the finding, but not all the details of the finding as presented in the Report. According to the student's timesheets and pay record, the student was paid \$60.75 for hours worked while scheduled for class. This amount only includes the federal portion of the liability. [See Exhibit 7-D.]

Student 33: (b)(6); (b)(7)(C) [2010-2011] The College generally agrees with the finding, but not all the details of the finding as presented in the Report. According to the student's timesheets and pay schedule, the student was paid for \$52.50 for hours worked while scheduled for class. This amount only includes the federal portion of the liability. See [See Exhibit 7-E.]

Student 42: (b)(6); (b)(7)(C) [2011-2012] The Report did not identify any specific concern with regard to this former student. [The Report said that Student #42 worked FWS hours during the same period classes were scheduled.] The student's payroll timesheets and attendance records indicate the student worked 7.07 hours while scheduled for class. According to the student's timesheets and pay scheduled, the student was paid for \$58.33 for hours worked while scheduled for class. This amount only includes the federal portion of the liability. [See Exhibit 7-F.]

Student 43: (b)(6); (b)(7)(C) [2011-2012] The Report did not identify any specific concern. [The Report said that Student #43 worked FWS hours during the same period classes were scheduled.] The student's payroll timesheets and attendance records indicate the student worked 0.25 hours while scheduled for class. According to the student's timesheets and pay scheduled, the student was paid for \$1.36 for hours worked while scheduled for class. This amount only includes the federal portion of the liability. [See Exhibit 7-G.]

Finding 8: Exit Counseling Not Documented

The review team identified one instance in the forty-three files examined where there was no loan exit counseling in the file of Student # 5, (b)(6); (b)(7)(C) a 2008 - 2009 Direct Loan borrower at the Montgomery Campus.

Fortis College does not agree with the concerns identified in the finding and provides its further response below.

Response:

The College recognizes the importance of adherence to the Department's rules and regulations as they pertain to providing timely student loan exit counseling to each Direct Loan borrower who graduates or withdraws from the College. The staff responsible for monitoring student accounts has been given refresher training on their entrance and exit loan counseling responsibilities.

With regard to the single instance identified by the Review Team, Student # 5, (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) the College maintains in its digital student records system Campus Vue (CV) an electronic history of the exit interviews printed and sent to the College's student who have ceased to be enrolled on at least a half time basis. Exhibit 8-A documents the completion of (b)(6); (b)(7)(C) exit interview on January 20, 2009. The CV system does not retain a copy of the exit interview sent on 1/20/09; however, we have reprinted the exit interview letter. (See Exhibit 8-B.) Please note that the date on the exit interview letter defaults to the current date, and so we have manually updated the date of this letter to reflect January 20, 2009 consistent with Exhibit 8-B. The point of attaching this letter is to show the essential content of the letter sent to the former student in 2009.

Finding 9: Consumer Information Not Disclosed

The review team identified one instance where there was a "disclaimer form" in the file of Student # 36, (b)(6); (b)(7)(C) who was enrolled in a Medical X-Ray Technology program at the Mobile Campus diploma program during the 2011-2012 award year. This form along with the enrollment agreement was signed on 10/17/2011. When questioned about why this form was only in one student's file, the Fortis College staff stated that this form was only required for all medical x-ray technology students. The form stated that if the student completed the medical x-ray technology program and obtained any necessary post-graduation certificates, the student would be qualified to obtain a position as a limited scope x-ray technician, medical assistant or medical office assistant in facilities such as urgent care centers or doctor's office. The disclaimer further stated that the medical x-ray technology program would not train the student to perform the breadth of procedures performed by full scope radiologic technologists and the student would not be able to obtain a position as a full scope radiologist technologist. When asked why this description of job opportunities for medical x-ray technology students was not included in FC's catalog or handbook, the staff mentioned that they were not aware that this information needed to be disclosed to all Medical X-ray Technology students prior to enrollment.

Fortis College does not agree with the concerns identified in the finding and provides its further response below.

Response:

The sample of forty-three Title IV recipients included three students who were enrolled in a diploma program titled Medical X-ray Technology. The specific student identified in this finding, (b)(6); (b)(7)(C) was enrolled at the Mobile Campus and the other two students in the sample who were enrolled in this same diploma program, (b)(6); (b)(7)(C) and (b)(6); (b)(7)(C) were enrolled at the campus in Montgomery, Alabama. This diploma program was only offered at two of the five campus locations included with this OPEID.

At the time each of the students enrolled, each received a Catalog and either paper copies or electronic access to the required student consumer information topics. (b)(6); (b)(7)(C) confirmed that she received all of the required student consumer information disclosures, including the Catalog at the time she signed her enrollment on 10/17/2011. (See Exhibit 9-A – page 2). The 2010 -2011 Mobile Campus, College Catalog contained the primary description of the program of study. At the time (b)(6); (b)(7)(C) enrolled, she received the Catalog. (See Exhibit 9-B.) The description of the program was as follows:

The Medical X-ray Technology program is designed to provide a learning experience based upon hands on, practical training that prepares a

student in a variety of medical skills. The students are given the opportunity to learn the competencies required of a basic x-ray technician; clinical skills in EKG, exam set up, phlebotomy, and other areas used in a physician's office, walk in clinic, or hospital/clinic setting.

Each of the Fortis Colleges has limited local authority to develop supplemental materials and forms in addition to the College's Catalog and full range of Consumer Information materials. Although the College believes the Catalog clearly expresses the limitations of the program by referring to "basic x-ray technician", other basic skills to be learned and likely sites for employment (physician's office or walk-in or hospital clinic), the administrative staff at the Mobile Campus, in the context of tailoring their admissions

procedures in 2011 for this relatively new Medical X-Ray Technology diploma program, developed a supplemental information disclaimer for applicants (See Exhibit 9-C) to explicitly state what graduates would not be qualified to do. The Montgomery campus administrators felt the catalog adequately described the nature of the Medical X-ray Technology program and did not use a disclaimer. The College does not believe there was any violation of the Department's rules by the Mobile campus for requiring that their applicants for admission sign a disclaimer nor does the College believe there was a violation by the College at its Montgomery Campus for not providing a disclaimer to its applicants to this diploma program Medical X-ray Technology.

In 2013, the Mobile and Montgomery campuses have received Alabama and ABHES approval for revisions to this diploma program, which is now titled "Medical Office Basic X-ray Technician." The College believes the longer name coupled with its standardized program descriptions on the College's webpage and in its Catalogs provides an appropriate description of the diploma program. (See Exhibit 9-D)

Finding 10: Conflicting Information

The review team identified one instance in the forty-three recipients files examined where there was apparent unresolved conflicting information in the former student's file. Specifically, there was a statement in student #22's (b)(6); (b)(7)(C) Montgomery campus) file from her mother dated 2/4/2010 that the recipients lived in her mother's household; however, on the former student's ISIR, she reported the size of her household as one. The former student was disbursed \$3,567 in a Pell Grant, \$2,920 in Direct Loans and \$385 in FWS wages.

Fortis College does not agree with the concerns identified in the finding and provides its further response below.

Response:

The former student identified in this finding, (b)(6); (b)(7)(C) was an Independent Student for Title IV eligibility purposes based on her age. The former student's date of birth was 12/23/1978, as reported on her ISIR, and she was 31 years old at the time she signed her FAFSA on 2/9/2010. (See Exhibit 10-A.) The former student reported no income in 2008 on her ISIR. The former student provided a statement to the College to explain her 2008 financial circumstances and housing arrangements since she had no reported income. The statement explains that she lived with her mother and her mother

was supporting the student. The College determined that the student's mother would not be in the Independent Student's household for Title IV purposes since the student was not providing more than half the support for the mother. The College does not believe that the Household size should be two, but one as reported on the ISIR. The College does not believe there was any conflicting information on this (b)(6) year old Independent Student's ISIR. (See Exhibit 10-B.)

Finding 11 Students Not Notified of Refunds to Lenders

The review team identified four instances in the forty-three recipients files examined where copies of the letters notifying the former students that a refund was made to the student borrower's Direct Loan account were not included in the student's file. The former students were # 16, #25, #32 and # 37.

Fortis College does not agree with the concerns identified in the finding and provides its further response below.

Response

As noted in the attached policy titled "Generating Refund Notification Letters," the College does not routinely retain paper copies of notices sent to Direct Loan borrowers in the student's paper financial aid file. The record of the letter's content is, however, retained electronically and the letters can be reprinted on request from the College's Campus Vue student data management system. The "Notification Letters" are produced by a "mail merge" at the same time as the Electronic Fund Transfer (EFT) is initiated. Attached please find copies of the reprinted "Notification of Refund" letters sent to each of the Direct Loan borrowers identified by the review team: #16, (b)(6); (b)(7)(C) (See Exhibit 11-A.); #25, (b)(6); (b)(7)(C) (See Exhibit 11-B.); #32, (b)(6); (b)(7)(C) (See Exhibit 11-C.) and #37 (b)(6); (b)(7)(C) (See Exhibit 11-D.). Also attached is the College's policy for creating, mailing and electronically retaining the data elements of the refund notifications sent to students of refunds made to their Direct Loan accounts. (See Exhibit 11-E.)

We again thank you very much for the courtesy shown during the review and for assisting us to resolve the findings in the report and improve our administration of the Title IV Student Assistance Programs.

Please feel free to contact me at (251) 222-0945 or FWilliams@edaff.com if you have any questions or need additional documentation.

Sincerely,

(b)(6); (b)(7)(C)

Felicia Williams
Director of Financial Aid

cc. Duncan Anderson, President & CEO

Exhibits: 66

Appendix I

Cost of Funds

Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost Allowance

Name of Institution:

Fortis College - Mobile OPEID: 023410

[illegible]

[illegible]

Appendix J

Estimated Actual Loss

Fortis College - Mobile
OPE ID 023410
Appendix J - Estimated Loss Formula

Estimated Loss Formula

9/16/2013

Enter Institution Name

Fortis College - Mobile

Select Institution Type

Proprietary 2 Yrs or Less

Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs	Estimated Loss Liability
1 DL Subsidized	2009-2010	\$ 647,551.57	8.20%	5.40%	\$ 34,945.01
2 DL Unsubsidized	2009-2010	\$ 171,887.60	8.20%	-20.62%	\$ -
3 DL PLUS	2009-2010	\$ 19,710.00	8.20%	-32.74%	\$ -
Description		\$ 839,149.17			\$ 34,945.01
4 DL Subsidized	2009-2010	\$ 37,721.00	8.20%	5.40%	\$ 2,035.61
5 DL Unsubsidized	2009-2010	\$ 14,165.00	8.20%	-20.62%	\$ -
6					
Description		\$ 51,886.00			\$ 2,035.61
7					
8					
9					
Description		\$ -			\$ -
10					
11					
12					
Description		\$ -			\$ -
Original Ineligible Loan Liability		\$ 891,035.17	Total Estimated Loss		\$ 36,980.62

Appendix J - Estimated Loss Formula

To calculate estimated loss for a given ineligible loan amount, that amount is multiplied by the total subsidy rates calculated for the ineligible loans. Consolidation Loans will be obtained in the future to prepay some of the ineligible loans; the amount of Consolidation Loans divided by the ineligible Stafford/PLUS loans equals the "Consolidation prepayment rate" (H) for those loans.

The Department's Budget Office calculates, on an annual basis, the rate per dollar of loan of default subsidies (DSRs) and all other subsidies (OSRs) (D & F) for Stafford and PLUS Loans, by cohort year, program, loan type, and risk group (note that 2008-2010 FFEL loan costs are calculated only by cohort year).

	A	B	C	D	E	F	G	H	I	J
	School CDR	Sector CDR*	Ratio **	DSR ***	Adjusted DSR	OSR ***	Avg Cons Year	Cons Prepay %	Cons DSR ***	Cons OS ***
1	8.20%	12.00%	0.68	0.78%	0.53%	2.85%	2017	21.1%	2.02%	7.52%
2	8.20%	12.00%	0.68	2.97%	2.02%	-22.82%	2017	17.3%	2.52%	-1.48%
3	8.20%	12.00%	0.68	1.24%	0.84%	-29.37%	2014	13.8%	1.90%	-32.38%
4	8.20%	12.00%	0.68	0.78%	0.53%	2.85%	2017	21.1%	2.02%	7.52%
5	8.20%	12.00%	0.68	2.97%	2.02%	-22.82%	2017	17.3%	2.52%	-1.48%
6										
7										
8										
9										
10										
11										
12										

Federal Student Aid (FSA) calculates the cohort default rates (CDRs) of the institution (A), and the average CDR for the sector for that institution (B). FSA applies the CDR comparison ratio (C), $[A/B = C]$ against the Budget Office's cohort loan DSR (D) to determine the default subsidy rate for the institution (E). The Budget Office estimates the default subsidy rate and other subsidy rate for the Consolidation Loans that will prepay some of these Stafford and PLUS Loans (I & J).

The total subsidy rate for the ineligible Stafford and PLUS Loans is $((E+F) + ((I+J) \times H))$.

The total subsidy cost for these loans is the ineligible loan amount multiplied by the total subsidy rate.

Appendix K

Finding 1: Ineligible High School Diploma File Review (ASA and AWA)

Student Last Name	Student First Name	Student AKA	Award Year (2010)	High School Diploma (Yes/No)	(b)(6); (b)(7)(C)	IFPELL	ISAGO	ISMART	ISTEACH	ISFREQ	ISFWS	ISPPERIONS	ISBUB	ISUNSUB	ISPLUB	ISBUB	ISUNSUB	ISDPLUS	Total Title IV Aid Amount
(b)(6); (b)(7)(C)			2009-10	Yes	(b)(6); (b)(7)(C)	\$3,507.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,019.00	\$0.00	\$8,071.00
			2009-10	Yes		\$5,350.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,085.00	\$0.00	\$10,145.00
			2009-10	Yes		\$2,875.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$0.00	\$0.00	\$4,622.50
			2009-10	Yes		\$7,133.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$843.00	\$0.00	\$11,486.00
			2009-10	Yes		\$7,133.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$843.00	\$0.00	\$11,486.00
			2009-10	Yes		\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$0.00	\$0.00	\$3,058.00
			2009-10	Yes		\$1,338.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$280.50	\$0.00	\$2,780.50
			2009-10	Yes		\$3,100.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$2,775.00	\$0.00	\$9,360.00
			2009-10	Yes		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,798.00	\$0.00	\$2,880.00
			2009-10	Yes		\$4,458.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$2,787.00	\$0.00	\$7,215.00
			2009-10	Yes		\$482.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$2,031.00	\$0.00	\$6,408.00
			2009-10	Yes		\$5,350.00	\$0.00	\$0.00	\$0.00	\$375.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,725.00
			2009-10	Yes		\$2,875.00	\$0.00	\$0.00	\$0.00	\$146.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,871.00
			2009-10	Yes		\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,783.00
			2009-10	Yes		\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$212.00	\$0.00	\$9,047.00
			2009-10	Yes		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,080.00	\$8,587.00	\$14,062.00
			2009-10	Yes		\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,302.00	\$0.00	\$0.00	\$6,652.00
			2009-10	Yes		\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,783.00
			2009-10	Yes		\$6,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,023.00	\$808.00	\$0.00	\$12,332.00
			2009-10	Yes		\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,783.00
			2009-10	Yes		\$3,588.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,508.00	\$838.00	\$0.00	\$5,728.00
			2009-10	Yes		\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,805.00	\$307.00	\$0.00	\$8,452.00
			2009-10	Yes		\$144.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$144.00
			2009-10	Yes		\$8,917.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,721.00	\$843.00	\$0.00	\$15,281.00
			2009-10	Yes		\$4,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,703.00	\$0.00	\$9,188.00
			2009-10	Yes		\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$422.00	\$0.00	\$5,800.00

Student Last Name	Student First Name	Student SSN	Award Year (2010)	High School Diploma (Yes/No)	Student Name at High School	\$PELL	\$ACG	\$SMART	\$TEACH	\$FEEG	\$FWS	\$PERKINS	\$SUB	\$UNSUB	\$PLUS	\$SUB	\$UNSUB	\$PLUS	Total Title IV Aid Amount
(b)(6); (b)(7)(C)					(b)(6); (b)(7)(C)	\$392.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$45.00	\$0.00	\$0.00	\$837.00
						\$5,556.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,484.50	\$1,223.50	\$0.00	\$11,264.00
						\$1,067.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,964.00	\$0.00	\$7,136.00
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$208.89	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$679.00	\$0.00	\$6,213.89
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$178.00	\$0.00	\$3,123.00
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,835.00	\$453.00	\$0.00	\$5,071.00
						\$8,833.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,968.00	\$357.00	\$14,653.00
						\$2,675.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,972.00	\$0.00	\$8,132.00
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$378.00	\$0.00	\$5,648.00
						\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$431.00	\$0.00	\$7,483.00
						\$2,675.00	\$0.00	\$0.00	\$0.00	\$375.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,050.00
						\$0.00	\$0.00	\$0.00	\$2.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,991.00	\$3,528.00	\$9,004.00
						\$4,458.00	\$0.00	\$0.00	\$2.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,414.00	\$2,12.00	\$0.00	\$7,098.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$348.75	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$361.00	\$0.00	\$9,544.75
						\$2,267.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$2,055.00	\$0.00	\$7,807.00
						\$8,925.00	\$0.00	\$0.00	\$2.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,500.00	\$318.00	\$0.00	\$13,844.00
						\$7,133.00	\$0.00	\$0.00	\$2.00	\$375.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2.00	\$7,908.00
						\$2,230.00	\$0.00	\$0.00	\$2.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,230.00
						\$7,133.00	\$0.00	\$0.00	\$2.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,670.00	\$4,419.00	\$0.00	\$16,222.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$0.00	\$0.00	\$9,060.00
						\$53.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$53.00
						\$6,242.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2.00	\$0.00	\$0.00	\$6,242.00

Student Last Name	Student First Name	Award Year (2010)	High School Diploma (Yes/No)	Name of High School	FFPEL	SAGO	SMART	STASH	SPSEOC	SPWS	SPPERKINS	SPUB	SUNBUB	SPPLUS	SPUB	SUNBUB	SPDPLUS	Total Title IV Aid Amount				
(b)(6); (b)(7)(C)					2008-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,950.00	\$1,018.00	\$0.00	\$5,751.00				
					2009-10	Yes	\$7,133.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,817.00	\$843.00	\$0.00	\$13,818.00	
					2008-10	Yes	\$2,300.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$123.00	\$0.00	\$3,645.00	
					2008-10	Yes	\$2,875.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,482.00	\$0.00	\$7,652.00	
					2008-10	Yes	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,327.00	\$0.00	\$10,162.00	
					2009-10	Yes	\$44.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$44.00	
					2009-10	Yes	\$4,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,565.00	\$0.00	\$9,450.00	
					2009-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$221.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,004.00	
					2008-10	Yes	\$882.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$208.20	\$0.00	\$3,424.20	
					2009-10	Yes	\$4,458.00	\$0.00	\$0.00	\$0.00	\$375.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,833.00	
					2009-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$215.00	\$0.00	\$3,160.00	
					2009-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$215.00	\$0.00	\$3,160.00	
					2009-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$215.00	\$0.00	\$3,160.00	
					2009-10	Yes	\$2,229.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,229.00	
					2009-10	Yes	\$1,338.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$333.00	\$0.00	\$2,833.00	
					2009-10	Yes	\$8,025.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,500.00	\$319.00	\$0.00	\$13,844.00
					2009-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$240.00	\$0.00	\$3,285.00
					2009-10	Yes	\$3,587.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$241.00	\$0.00	\$6,152.00
					2009-10	Yes	\$3,587.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$2,068.00	\$0.00	\$9,118.00
					2009-10	Yes	\$4,227.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$525.00	\$0.00	\$8,337.00
					2009-10	Yes	\$3,587.00	\$0.00	\$0.00	\$0.00	\$375.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,942.00
					2009-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$348.00	\$0.00	\$3,203.00
					2009-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$219.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,002.00
					2009-10	Yes	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$218.00	\$0.00	\$3,144.00
					2009-10	Yes	\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,002.00
					2009-10	Yes	\$7,134.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,867.00	\$222.00	\$0.00	\$12,256.00

Student Last Name	Student First Name	Student SSN	Award Year (2010)	High School Diploma (Yes/No)	Name of High School	FFPELL	LAGO	ISNARI	ATEACH	FFBROG	FFWB	FFPERKINS	FFSUB	FFUNSUB	FFPLUS	FFSUB	FFUNSUB	FFPLUS	Total Title IV Aid Amount
(b)(6); (b)(7)(C)						\$7,133.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,438.00	\$361.00	\$0.00	\$12,333.00
						\$1,104.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$240.00	\$0.00	\$2,508.00
						\$7,133.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,438.00	\$361.00	\$0.00	\$12,333.00
						\$3,568.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,568.00
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,783.00
						\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$749.00	\$0.00	\$7,801.00
						\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$333.00	\$0.00	\$7,385.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$82.00	\$0.00	\$9,152.00
						\$882.00	\$0.00	\$0.00	\$0.00	\$125.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,017.00
						\$1,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,968.00	\$0.00	\$6,453.00
						\$2,075.00	\$0.00	\$0.00	\$0.00	\$149.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,815.00
						\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$854.00	\$0.00	\$0.00	\$854.00
						\$3,122.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,388.00	\$0.00	\$0.00	\$4,421.00
						\$5,100.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,858.00	\$0.00	\$10,444.00
						\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,988.00	\$0.00	\$9,021.00
						\$2,875.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,875.00
						\$2,933.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,768.00	\$0.00	\$8,176.00
						\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,864.00	\$0.00	\$9,016.00
						\$7,133.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,538.00	\$361.00	\$0.00	\$12,256.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$319.00	\$0.00	\$9,379.00
						\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$619.00	\$0.00	\$6,510.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,811.00	\$0.00	\$10,871.00
						\$59.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$59.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$771.00	\$0.00	\$9,196.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$643.00	\$0.00	\$9,478.00
						\$882.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$212.00	\$0.00	\$2,266.00

Student Last Name	Student First Name	Student ID	Award Year (2010)	High School Diploma (Yes/No)	Name of High School	PELL	AG	SMART	TEACH	FEED	FWY	PERKINS	SAUB	SUNBUR	PLUS	SUB	SUNBUR	PLUS	Total Title IV Aid Amount
(b)(6); (b)(7)(C)						\$5,797.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,123.00	\$532.00	\$0.00	\$11,457.00
						\$4,458.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,738.00	\$0.00	\$8,682.00
						\$3,044.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,122.00	\$1,255.00	\$0.00	\$5,524.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,304.00	\$0.00	\$0.00	\$6,654.00
						\$2,675.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,675.00
						\$783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$783.00
						\$7,123.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,023.88	\$0.00	\$0.00	\$0.00	\$0.00	\$5,855.00	\$943.00	\$0.00	\$14,754.88
						\$448.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,282.00
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,783.00
						\$3,588.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,323.00	\$458.00	\$0.00	\$8,318.00
						\$7,874.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,803.00	\$443.00	\$0.00	\$12,820.00
						\$3,587.00	\$0.00	\$0.00	\$0.00	\$150.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$635.00	\$0.00	\$7,637.00
						\$3,587.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$682.00	\$0.00	\$8,014.00
						\$3,587.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$0.00	\$0.00	\$7,052.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$375.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,725.00
						\$3,588.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$235.00	\$0.00	\$6,125.00
						\$2,873.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$1,204.00	\$0.00	\$4,141.00
						\$5,333.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,260.00	\$1,708.00	\$0.00	\$12,332.00
						\$1,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,700.00
						\$5,587.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$685.00	\$0.00	\$0.00	\$8,252.00
						\$1,338.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,338.00
						\$1,133.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,891.00	\$1,844.00	\$8,453.00
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,783.00
						\$1,787.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$311.00	\$0.00	\$0.00	\$2,078.00
						\$5,380.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,327.00	\$0.00	\$10,187.00
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$0.00	\$0.00	\$5,268.00
						\$1,338.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,223.00	\$285.40	\$0.00	\$2,846.40

Student Last Name	Student First Name	Student SSN	Award Year (2010)	High School Diploma (Yes/No)	Name of High School	IFPELL	SACG	SMART	STREACH	IFBEOG	IFBWS	IFPERKINS	IFBUB	SUNBUB	IFPLUS	SUBI	SUNBUB	IFPLUS	Total Title IV Aid Amount
(b)(6); (b)(7)(C)						\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,327.00	\$0.00	\$10,162.00
						\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$178.00	\$0.00	\$3,123.00
						\$5,884.00	\$2.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$532.00	\$0.00	\$9,881.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,350.00
						\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,567.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,058.00	\$0.00	\$9,881.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$361.00	\$0.00	\$9,421.00
						\$1,890.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$121.00	\$0.00	\$3,173.00
						\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
						\$882.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$882.00
						\$7,133.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$643.00	\$0.00	\$11,261.00
						\$3,209.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$2,189.00	\$0.00	\$8,654.00
						\$7,133.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,639.00	\$81.00	\$0.00	\$12,728.00
						\$8,917.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,791.00	\$475.00	\$0.00	\$15,063.00
						\$328.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$328.50
						\$2,875.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,717.00	\$0.00	\$7,877.00
						\$7,133.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$8,626.00	\$430.00	\$0.00	\$14,189.00
						\$7,133.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,465.32	\$0.00	\$12,083.32
						\$5,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$319.00	\$0.00	\$8,804.00
						\$7,133.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,538.00	\$361.00	\$0.00	\$12,258.00
						\$1,293.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$107.00	\$0.00	\$3,052.00
						\$5,350.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$28.00	\$0.00	\$9,068.00
						\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$241.00	\$0.00	\$6,132.00
						\$2,345.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,162.00	\$240.00	\$0.00	\$3,847.00
						\$7,133.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,570.00	\$581.00	\$0.00	\$12,489.00
						\$445.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$445.00
						\$1,233.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$588.00	\$0.00	\$2,981.00
						\$488.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$1,060.28	\$0.00	\$5,902.28

Student Last Name	Student First Name	Student SSN	Award Year (2010)	High School Diploma (Yes/No)	Name of High School	IFPELL	IFACD	IFBART	IFTEACH	IFBREG	IFWIS	IFPERKINS	IFSUB	IFUNSUB	IFPLUS	IFSUB	IFUNSUB	IFDPLUS	Total Title IV Aid Amount		
(b)(6); (b)(7)(C)			2009-10	Yes	(b)(6); (b)(7)(C)	\$5,378.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$319.00	\$0.00	\$9,182.00		
			2009-10	Yes		\$1,197.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,197.00		
			2009-10	Yes		\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,567.00	
			2009-10	Yes		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$4,882.00	\$0.00	\$8,367.00
			2009-10	Yes		\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$220.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,003.00
			2009-10	Yes		\$3,697.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,21.00	\$0.00	\$0.00	\$3,738.00
			2009-10	Yes		\$3,647.00	\$0.00	\$0.00	\$0.00	\$0.00	\$375.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,942.00
			2009-10	Yes		\$3,200.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$2,785.00	\$0.00	\$9,450.00
			2009-10	Yes		\$3,819.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,374.00	\$355.00	\$0.00	\$6,298.00
			2009-10	Yes		\$3,121.00	\$0.00	\$0.00	\$0.00	\$0.00	\$375.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,496.00
			2009-10	Yes		\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$180.00	\$0.00	\$3,135.00
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
			2009-10	Yes																	
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		
		2009-10	Yes																		

Appendix L

Finding 1: Ineligible High School Diploma File Review (Other)

Student Last Name	Student First Name	Award Year (2018)	High School Diploma (Yes/No)	Name of High School	EPPEL	SAGO	SMART	TEACH	SECOG	TPWI	PPERKINS	ISUB	SUNBUB	EPPLUS	ISUB	SUNBUB	EPPLUS	Total Title IV Aid Amount
(b)(6); (b)(7)(C)				(b)(6); (b)(7)(C)	\$131.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$131.00
					\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$191.00	\$0.00	\$4,299.00
					\$2,350.00	\$0.00	\$0.00	\$0.00	\$175.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,725.00
					\$8,075.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,878.00	\$0.00	\$0.00	\$10,953.00
					\$1,783.00	\$0.00	\$0.00	\$0.00	\$175.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,154.00	\$0.00	\$0.00	\$3,112.00
					\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,443.00	\$0.00	\$8,928.00
					\$1,800.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,800.00
					\$2,350.00	\$0.00	\$0.00	\$0.00	\$175.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$391.00	\$0.00	\$5,421.00
					\$3,568.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,323.00	\$0.00	\$0.00	\$5,891.00
					\$72.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$72.00
					\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,897.00	\$0.00	\$7,165.00
					\$4,805.00	\$0.00	\$0.00	\$0.00	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$0.00	\$0.00	\$8,515.00
					\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,897.00	\$0.00	\$7,165.00
					\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$121.00	\$0.00	\$3,086.00
					\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,783.00
					\$3,597.00	\$0.00	\$0.00	\$0.00	\$175.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,842.00
					\$8,688.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$8,688.00
					\$3,587.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$748.00	\$0.00	\$7,780.00
					\$1,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,897.00	\$0.00	\$7,165.00
					\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,812.00	\$0.00	\$10,447.00
				TOTAL	\$80,863.00	\$0.00	\$0.00	\$0.00	\$1,875.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$37,721.00	\$14,168.00	\$0.00	\$116,514.00

Appendix M

Finding 2: Pell Overpayment/Underpayment File Review

FC Mobile^OPE 023410^PRCN 2012-4-04-28049^Finding 2

			SUMMARY					
Campus	LAST NAME	FIRST NAME	Original PELL Disbursed in All Terms	Correct PELL in All Terms	Total Pell Refund Due / (Underaward d)	08/09 PELL REFUND DUE	REFUND PAID BACK TO DEPT OF ED (YES/N O)	08/09 PELL UNDER AWARD
Pensacola	(b)(6); (b)(7)(C)		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology			\$ 789	\$ 789	\$ -			
School of Cosmetology			\$ 789	\$ 789	\$ -			
Mobile			\$ 1,577	\$ 1,577	\$ -			
Montgomery			\$ 3,943	\$ 3,943	\$ -			
Mobile			\$ 4,731	\$ 4,731	\$ -			
Montgomery			\$ 1,577	\$ 1,577	\$ -			
Mobile			\$ 4,731	\$ 4,337	\$ 394	\$ 394	1	
Montgomery			\$ 1,577	\$ 1,972	\$ (395)			\$ 395
Pensacola			\$ 3,154	\$ 3,944	\$ (790)			\$ 790
Montgomery			\$ 4,731	\$ 4,731	\$ -			
Mobile			\$ 3,154	\$ 3,154	\$ -			
Montgomery			\$ 4,731	\$ 4,731	\$ -			
Mobile			\$ 3,154	\$ 3,154	\$ -			
Montgomery			\$ 4,731	\$ 4,731	\$ -			
Montgomery			\$ 860	\$ 860	\$ -			
Pensacola			\$ 1,181	\$ 1,083	\$ 98	\$ 98	1	
Montgomery			\$ 3,154	\$ 3,154	\$ -			
Montgomery			\$ 1,577	\$ 1,577	\$ -			
Mobile			\$ 4,731	\$ 4,731	\$ -			

School of Cosmetology	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,337	\$ 4,337	\$ -			
Mobile		\$ 394	\$ 394	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,527	\$ 1,527	\$ -			
Montgomery		\$ 3,054	\$ 3,054	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 988	\$ 1,184	\$ (196)			\$ 196
School of Cosmetology		\$ 3,154	\$ 2,366	\$ 788	\$ 788	1	
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 256	\$ 256	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 2,588	\$ 3,235	\$ (647)			\$ 647
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,548	\$ 3,548	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,327	\$ 1,327	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 3,943	\$ 3,943	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 921	\$ 921	\$ -			
Pensacola		\$ -	\$ -	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 2,781	\$ 2,781	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 4,731	\$ 4,337	\$ 394	\$ 394	1	
Montgomery		\$ -	\$ -	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,183	\$ 1,183	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 4,337	\$ 4,337	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,360	\$ 1,360	\$ -			
Pensacola		\$ 3,881	\$ 3,881	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 3,549	\$ 3,549	\$ -			
Mobile		\$ 1,577	\$ 2,366	\$ (789)			\$ 789
Pensacola		\$ 4,731	\$ 3,943	\$ 788	\$ 788	1	
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 3,881	\$ 3,881	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Mobile		\$ 1,971	\$ 1,971	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,943	\$ 3,549	\$ 394	\$ 394	1	
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,732	\$ 4,732	\$ -			
Montgomery		\$ 3,881	\$ 3,881	\$ -			
Mobile		\$ 4,380	\$ 4,380	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 890	\$ 890	\$ -			
Pensacola		\$ 264	\$ 527	\$ (263)			\$ 263
Pensacola		\$ 1,451	\$ 1,451	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 890	\$ 890	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,140	\$ 1,140	\$ -			
School of Cosmetology		\$ 2,787	\$ 2,787	\$ -			
Montgomery		\$ 2,836	\$ 2,836	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 827	\$ 827	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 2,366	\$ 3,548	\$ (1,182)			\$ 1,182
Pensacola		\$ 1,782	\$ 1,782	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 789	\$ 789	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,578	\$ 1,578	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,943	\$ 3,943	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,155	\$ 2,383	\$ 772	\$ 772	1	
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 3,881	\$ 3,881	\$ -			
Mobile		\$ 1,577	\$ 1,183	\$ 394	\$ 394	1	
Montgomery		\$ 960	\$ 960	\$ -			
Mobile		\$ 297	\$ 256	\$ 41	\$ 41	1	
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 3,068	\$ 3,068	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,183	\$ 394	\$ 394	1	
Montgomery		\$ 1,587	\$ 1,587	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 3,942	\$ 3,942	\$ -			
Pensacola		\$ 860	\$ 860	\$ -			
School of Cosmetology		\$ 3,943	\$ 2,366	\$ 1,577	\$ 1,577	1	

Montgomery	(b)(6); (b)(7)(C)	\$ 1,427	\$ 1,427	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 2,091	\$ 2,091	\$ -			
Mobile		\$ 394	\$ 394	\$ -			
Montgomery		\$ 2,984	\$ 2,984	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 264	\$ 264	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,581	\$ 3,052	\$ 1,529	\$ 1,529	1	
Montgomery		\$ 2,818	\$ 2,818	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,155	\$ 3,155	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 2,520	\$ 1,890	\$ 630	\$ 630	1	
Montgomery		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 789	\$ 789	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,527	\$ 2,290	\$ (763)			\$ 763
Pensacola		\$ 1,360	\$ 1,048	\$ 312	\$ 312	1	
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Pensacola		\$ 2,381	\$ 2,381	\$ -			
Pensacola		\$ 3,548	\$ 3,548	\$ -			
Pensacola		\$ 3,154	\$ 2,366	\$ 788	\$ 788	1	
Mobile		\$	\$	\$			

Montgomery	(b)(6); (b)(7)(C)	\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 394	\$ 394	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,971	\$ (394)			\$ 394
Pensacola		\$ 1,160	\$ 1,160	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,943	\$ 3,549	\$ 394	394	1	
Montgomery		\$ 2,911	\$ 2,911	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 788	\$ 788	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,094	\$ 1,094	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
School of Cosmetology		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,325	\$ 1,325	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,337	\$ 4,337	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,337	\$ 394	394	1	
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,365	\$ 2,365	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,577	\$ 1,583	\$ (6)			6
School of Cosmetology		\$ 3,154	\$ 2,366	\$ 788	788	1	
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 2,234	\$ 2,457	\$ (223)			223

Mobile	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,943	\$ 4,337	\$ (394)			394
Pensacola		\$ 3,548	\$ 3,943	\$ (395)			395
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,081	\$ 3,081	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
School of Cosmetology		\$ 3,181	\$ 3,181	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 788	\$ 1,577	\$ (789)			789
School of Cosmetology		\$ 1,427	\$ 1,427	\$ -			
Pensacola		\$ 2,760	\$ 2,760	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 2,366	\$ 1,972	\$ 394	394	1	
Mobile		\$ 2,521	\$ 2,521	\$ -			
Pensacola		\$ 563	\$ 563	\$ -			

School of Cosmetology	Crear	Charlene	\$ 614	\$ 614	\$ -			
Mobile	Crimes	Tamara	\$ 2,168	\$ 2,760	\$ (592)			592
Pensacola	Crocker	Shavon	\$ 789	\$ 789	\$ -			
Mobile	Crockett	Megan	\$ 1,094	\$ 1,094	\$ -			
Pensacola	Crutchfield	Brittany	\$ 4,731	\$ 4,731	\$ -			
Pensacola	Cumbee	Kierra	\$ 3,154	\$ 3,154	\$ -			
Montgomery	Cunningham	Allancia	\$ 1,060	\$ 1,060	\$ -			
Montgomery	Curl	Catherina	\$ 1,127	\$ 1,127	\$ -			
Pensacola	Curry	Keith	\$ 3,154	\$ 3,154	\$ -			
Pensacola	Cusipag	Audrey Rose	\$ 3,154	\$ 3,154	\$ -			
Pensacola	Cutaio	Mica	\$ 1,577	\$ 1,577	\$ -			
Pensacola	Cutts	Delania	\$ 2,957	\$ 2,957	\$ -			
Mobile	Daffin III	Grady	\$ 789	\$ 789	\$ -			
Mobile	Dailey	Christine	\$ 2,760	\$ 2,366	\$ 394	394	1	
Mobile	Dale	Alexandria	\$ 4,731	\$ 4,731	\$ -			
Montgomery	Dale	Kylia	\$ 894	\$ 670	\$ 224	224	1	
Montgomery	Dandridge	Brandy	\$ 1,460	\$ 1,460	\$ -			
Montgomery	Daniel	Tangela	\$ 1,260	\$ 1,260	\$ -			
School of Cosmetology	Daniels	Cari	\$ 4,731	\$ 4,731	\$ -			
Montgomery	Danner	Paige	\$ 3,281	\$ 3,281	\$ -			
Montgomery	Dansby	Latoya	\$ 1,577	\$ 1,183	\$ 394	394	1	
Pensacola	Danzot	Maria	\$ 1,577	\$ 1,183	\$ 394	394	1	
School of Cosmetology	Datcher	Tonya	\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology	Davidson	Valencia	\$ 4,731	\$ 4,731	\$ -			
Mobile	Davis	Jackie	\$ 4,731	\$ 4,731	\$ -			
Pensacola	Davis	Lekesha	\$ 3,154	\$ 3,154	\$ -			
Pensacola	Davis	Patricia	\$ 1,577	\$ 1,972	\$ (395)			395
Pensacola	Davis	Rodney	\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology	Davis	Shelby	\$ 3,154	\$ 3,154	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,481	\$ 4,481	\$ -			
Montgomery		\$ 3,136	\$ 3,136	\$ -			
Mobile		\$ 1,981	\$ 1,981	\$ -			
Pensacola		\$ 690	\$ 690	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,365	\$ 2,365	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 2,760	\$ (1,183)			1,183
School of Cosmetology		\$ 4,181	\$ 4,181	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 447	\$ 447	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,577	\$ 1,972	\$ (395)			395
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,154	\$ 3,550	\$ (396)			396
Mobile		\$ 3,181	\$ 3,181	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,972	\$ (395)			395
Pensacola		\$ 3,154	\$ 3,154	\$ -			

School of Cosmetology	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 3,781	\$ 3,781	\$ -			
Pensacola		\$ 380	\$ 380	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 2,521	\$ 2,521	\$ -			
Montgomery		\$ 2,760	\$ 2,760	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 2,854	\$ 2,854	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 4,731	\$ 4,337	\$ 394	394	1	
Mobile		\$ 890	\$ 890	\$ -			
School of Cosmetology		\$ 1,381	\$ 1,381	\$ -			
Pensacola		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,481	\$ 4,481	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 3,481	\$ 3,191	\$ 290	290	1	
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 730	\$ 730	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 395	\$ 1,182	1182	1	
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,183	\$ 394	394	1	
Mobile		\$ 1,577	\$ 1,183	\$ 394	394	1	
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,427	\$ 1,427	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 2,760	\$ 1,577	\$ 1,183	1183	1	
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,127	\$ 1,127	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,921	\$ 1,921	\$ -			
Montgomery		\$ 1,294	\$ 1,294	\$ -			
Pensacola		\$ 2,365	\$ 2,365	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 1,987	\$ 1,987	\$ -			
Pensacola		\$ 514	\$ 514	\$ -			
Pensacola		\$ -	\$ -	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,360	\$ 1,360	\$ -			
Pensacola		\$ 2,318	\$ 2,318	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 3,943	\$ 788	788	1	
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 3,281	\$ 3,281	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
Pensacola		\$ 1,919	\$ 1,919	\$ -			
Montgomery		\$ 230	\$ 230	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 1,577	\$ 394	\$ 1,183	1183	1	
Mobile		\$ 1,360	\$ 1,360	\$ -			
Mobile		\$ 2,255	\$ 2,255	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,854	\$ 928	\$ 926	926	1	
Montgomery		\$ 2,681	\$ 2,681	\$ -			
Montgomery		\$ 1,577	\$ 4,731	\$ (3,154)			3,154
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 788	\$ 788	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 2,365	\$ 2,365	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 2,366	\$ 788	788	1	
Pensacola		\$ 3,155	\$ 3,549	\$ (394)			394
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,081	\$ 4,081	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,337	\$ 394	394	1	
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,337	\$ 4,337	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 2,366	\$ 788	788	1	
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 2,365	\$ 2,365	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,735	\$ 3,009	\$ (274)			274
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 1,787	\$ 1,787	\$ -			
Pensacola		\$ 1,560	\$ 1,560	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,972	\$ 1,972	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,337	\$ 3,943	\$ 394	394	1	
Montgomery		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 4,731	\$ 4,337	\$ 394	394	1	
Montgomery		\$ 780	\$ 780	\$ -			
Pensacola		\$ 560	\$ 560	\$ -			
Pensacola		\$ 327	\$ 327	\$ -			
Pensacola		\$ 1,972	\$ 1,972	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 2,760	\$ (1,183)			1,183
Montgomery		\$ 1,194	\$ 1,194	\$ -			
Pensacola		\$ 2,181	\$ 2,181	\$ -			
Montgomery		\$ 1,971	\$ 1,577	\$ 394	394	1	
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 2,581	\$ 2,581	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 789	\$ 1,577	\$ (788)			788
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,294	\$ 1,294	\$ -			
Pensacola		\$ 1,578	\$ 1,578	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 760	\$ 950	\$ (190)			190
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 960	\$ 960	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,155	\$ 3,155	\$ -			
Montgomery		\$ 4,481	\$ 4,481	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,327	\$ 1,327	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
Mobile		\$ 690	\$ 921	\$ (231)			231
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,971	\$ 1,971	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,943	\$ (789)			789
Montgomery		\$ 394	\$ 394	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 2,481	\$ 2,481	\$ -			
Mobile		\$ 3,549	\$ 3,155	\$ 394	394	1	
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 3,681	\$ 3,681	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,841	\$ 1,841	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,791	\$ 1,791	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 3,732	\$ 2,986	\$ 746	746	1	
Pensacola		\$ 2,534	\$ 1,170	\$ 1,364	1364	1	
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 593	\$ 593	\$ -			
Mobile		\$ 2,760	\$ 2,760	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 1,655	\$ 1,655	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
School of Cosmetology		\$ 2,381	\$ 2,381	\$ -			
Pensacola		\$ 360	\$ 360	\$ -			
Mobile		\$ 4,731	\$ 3,943	\$ 788	788	1	
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,081	\$ 3,081	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,183	\$ 394	394	1	
Mobile		\$ 1,294	\$ 1,294	\$ -			
School of Cosmetology							

Pensacola	(b)(6); (b)(7)(C)	\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,577	\$ 2,366	\$ (789)			789
Montgomery		\$ 1,527	\$ 1,527	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 3,054	\$ 3,054	\$ -			
Pensacola		\$ 669	\$ 825	\$ (156)			156
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 2,881	\$ 2,881	\$ -			
School of Cosmetology		\$ 527	\$ 527	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
School of Cosmetology		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,972	\$ (395)			395
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ -	\$ -	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ -	\$ -	\$ -			
Montgomery		\$ 1,575	\$ 1,575	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 2,781	\$ 2,781	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery							
Mobile		\$ 4,337	\$ 3,943	\$ 394	394	1	
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 2,760	\$ 2,760	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,360	\$ 1,360	\$ -			
Montgomery		\$ 3,581	\$ 3,581	\$ -			
School of Cosmetology		\$ 1,194	\$ 1,194	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 614	\$ 614	\$ -			
Montgomery		\$ 1,121	\$ 1,121	\$ -			
Pensacola		\$ 297	\$ 297	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,481	\$ 4,481	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 890	\$ 890	\$ -			
Pensacola		\$ 359	\$ 394	\$ (35)			35
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,337	\$ 4,337	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 789	\$ 789	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,971	\$ 1,971	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,981	\$ 3,981	\$ -			
Pensacola		\$ 3,381	\$ 3,381	\$ -			
Montgomery		\$ 1,060	\$ 1,060	\$ -			
Montgomery		\$ 794	\$ 794	\$ -			
Mobile		\$ 594	\$ 594	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 394	\$ 394	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,943	\$ 4,337	\$ (394)			394
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,943	\$ 4,337	\$ (394)			394
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 789	\$ 789	\$ -			
Pensacola		\$ 2,291	\$ 2,291	\$ -			
Pensacola		\$ 2,521	\$ 2,521	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 789	\$ 788	788	1	
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 464	\$ 464	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,337	\$ 4,337	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 2,988	\$ 2,988	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 2,191	\$ 2,191	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 3,481	\$ 3,481	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,427	\$ 1,427	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 3,943	\$ 3,943	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 2,365	\$ 2,365	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 6,308	\$ 5,125	\$ 1,183	1183	1	
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 1,841	\$ 1,841	\$ -			
Pensacola		\$ 464	\$ 464	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 2,366	\$ (789)			789
Montgomery		\$ 1,235	\$ 1,235	\$ -			
Pensacola		\$ 2,366	\$ 3,943	\$ (1,577)			1,577
Mobile		\$ 2,366	\$ 3,155	\$ (789)			789
Pensacola		\$ -	\$ -	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 784	\$ 940	\$ (156)			156
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 3,155	\$ 3,155	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,971	\$ 1,183	\$ 788	788	1	
Pensacola		\$ 789	\$ 2,366	\$ (1,577)			1,577
Montgomery		\$ 2,190	\$ 2,190	\$ -			
Pensacola		\$ 627	\$ 627	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,943	\$ (789)			789
Mobile		\$ 727	\$ 1,091	\$ (364)			364
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,183	\$ 394	394	1	
Mobile		\$ 3,154	\$ 3,154	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 2,191	\$ 2,191	\$ -			
Montgomery		\$ 1,194	\$ 1,194	\$ -			
Pensacola		\$ 3,548	\$ 1,971	\$ 1,577	1577	1	
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,972	\$ 1,972	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,183	\$ 1,183	\$ -			
Mobile		\$ 1,577	\$ 1,183	\$ 394	394	1	
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 789	\$ 789	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 4,731	\$ (1,577)			1,577
Montgomery		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 215	\$ 215	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 1,427	\$ 1,427	\$ -			
Pensacola		\$ 1,387	\$ 1,387	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 789	\$ 789	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 1,027	\$ 1,540	\$ (513)			513
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 2,760	\$ 2,366	\$ 394	394	1	
School of Cosmetology		\$ 4,681	\$ 4,681	\$ -			
Mobile		\$ 1,577	\$ 2,366	\$ (789)			789
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,943	\$ 3,943	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,060	\$ 1,060	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,427	\$ 1,784	\$ (357)			357
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 427	\$ 427	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 894	\$ 514	\$ 380	380	1	
Mobile		\$ 394	\$ 394	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,181	\$ 3,833	\$ 348	348	1	
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,881	\$ 1,881	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,070	\$ 1,070	\$ -			
Mobile		\$ 3,155	\$ 3,155	\$ -			
Pensacola		\$ 654	\$ 654	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 3,381	\$ 3,381	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,181	\$ 4,181	\$ -			
Montgomery		\$ 3,154	\$ 3,549	\$ (395)			395
Pensacola		\$ 941	\$ 941	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 527	\$ 527	\$ -			
School of Cosmetology		\$ 3,281	\$ 3,281	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 3,155	\$ 3,943	\$ (788)			788
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,155	\$ 3,155	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 427	\$ 427	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 4,581	\$ 4,581	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,560	\$ 1,950	\$ (390)			390
Pensacola		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 3,362	\$ 3,362	\$ -			
School of Cosmetology		\$ 3,154	\$ 2,366	\$ 788	788	1	
Pensacola		\$ 789	\$ 1,080	\$ (291)			291
School of Cosmetology		\$ 4,481	\$ 4,481	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,577	\$ 2,366	\$ (789)			789
Pensacola		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,981	\$ 3,981	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 2,760	\$ 2,760	\$ -			
Mobile		\$ 1,577	\$ 2,760	\$ (1,183)			1,183
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,577	\$ 2,760	\$ (1,183)			1,183

Montgomery	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,260	\$ 1,575	\$ (315)			315
Montgomery		\$ 1,577	\$ 2,366	\$ (789)			789
Pensacola		\$ 3,155	\$ 3,155	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,581	\$ 4,581	\$ -			
Montgomery		\$ 4,281	\$ 4,281	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,548	\$ 3,548	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,290	\$ 4,290	\$ -			
Montgomery		\$ 1,494	\$ 1,494	\$ -			
School of Cosmetology		\$ 4,081	\$ 4,081	\$ -			
Pensacola		\$ 1,165	\$ 1,165	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,577	\$ 2,366	\$ (789)			789
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 787	\$ 787	\$ -			

School of Cosmetology	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 960	\$ 960	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,121	\$ 3,121	\$ -			
Mobile		\$ 2,760	\$ 2,760	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,481	\$ 4,481	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 1,577	\$ 3,154	\$ (1,577)			1,577
Montgomery		\$ 3,155	\$ 3,155	\$ -			
Montgomery		\$ 3,681	\$ 3,681	\$ -			
School of Cosmetology		\$ 1,281	\$ 1,281	\$ -			
Mobile		\$ 297	\$ 256	\$ 41	41	1	
Pensacola		\$ 3,481	\$ 3,481	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,527	\$ 1,527	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 2,181	\$ 2,181	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 3,154	\$ (1,577)			1,577
Montgomery		\$ 2,761	\$ 2,761	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,381	\$ 4,381	\$ -			
Montgomery		\$ 1,183	\$ 1,183	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,281	\$ 4,281	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 789	\$ 1,183	\$ (394)			394
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 2,121	\$ 2,121	\$ -			
Mobile		\$ 382	\$ 382	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 394	\$ 394	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 240	\$ 240	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,327	\$ 1,659	\$ (332)			332
Pensacola		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,578	\$ 1,578	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 394	\$ 394	\$ -			
Pensacola		\$ 1,360	\$ 1,360	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 2,366	\$ (789)			789
Pensacola		\$ 2,581	\$ 2,581	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 3,548	\$ 3,548	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,294	\$ 1,294	\$ -			
Mobile		\$ 730	\$ 365	\$ 365	365	1	
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 2,981	\$ 2,981	\$ -			
School of Cosmetology		\$ 2,387	\$ 2,387	\$ -			
Montgomery		\$ 4,181	\$ 4,181	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 3,651	\$ 3,651	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 3,155	\$ 2,366	\$ 789	789	1	
Mobile		\$ 789	\$ 789	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,328	\$ 1,659	\$ (331)			331
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,155	\$ 3,155	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 921	\$ 921	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Pensacola		\$ 427	\$ 427	\$ -			
Pensacola		\$ 1,230	\$ 1,260	\$ (30)			30
Mobile		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			

School of Cosmetology	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 927	\$ 464	\$ 463	463	1	
Pensacola		\$ 3,943	\$ 3,943	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,235	\$ 3,235	\$ -			
Mobile		\$ 1,060	\$ 1,060	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,578	\$ 1,578	\$ -			
Pensacola		\$ 1,774	\$ 1,654	\$ 120	120	1	
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 2,434	\$ 2,434	\$ -			
Pensacola		\$ 1,577	\$ 1,183	\$ 394	394	1	
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			
Mobile		\$ 3,548	\$ 3,548	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Mobile		\$ 1,577	\$ 1,183	\$ 394	394	1	
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 730	\$ 730	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,681	\$ 2,681	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 2,381	\$ 3,061	\$ (680)			680
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 3,154	\$ 3,943	\$ (789)			789
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,183	\$ 1,183	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 3,481	\$ 3,481	\$ -			
Mobile		\$ 860	\$ 860	\$ -			
Pensacola		\$ 1,577	\$ 1,972	\$ (395)			395
Montgomery		\$ 2,787	\$ 2,787	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,527	\$ 1,527	\$ -			
Pensacola		\$ 2,760	\$ 2,760	\$ -			
Mobile		\$ 247	\$ 247	\$ -			
Pensacola		\$ 2,366	\$ 3,943	\$ (1,577)			1,577
Montgomery		\$ 1,577	\$ 2,976	\$ (1,399)			1,399
Montgomery		\$ 3,081	\$ 3,081	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 2,040	\$ 2,040	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Montgomery		\$ 4,731	\$ 3,954	\$ 777	777	1	
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 3,981	\$ 3,981	\$ -			
Montgomery		\$ 1,521	\$ 1,521	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ -	\$ -	\$ -			
Mobile		\$ 1,127	\$ 1,127	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,881	\$ 3,881	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 394	\$ 394	\$ -			
Montgomery		\$ 1,460	\$ 1,460	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,587	\$ 1,587	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,181	\$ 3,181	\$ -			
Montgomery		\$ 3,944	\$ 3,944	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,183	\$ 1,183	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 394	\$ 394	\$ -			
Montgomery		\$ 3,943	\$ 4,337	\$ (394)			394
Pensacola		\$ 1,972	\$ 1,972	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 788	\$ 788	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 788	\$ 788	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 1,027	\$ 1,027	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,578	\$ 1,578	\$ -			
Montgomery		\$	\$	\$			
School of Cosmetology		\$ 2,365	\$ 2,365	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 2,366	\$ 3,154	\$ (788)			788
Pensacola		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 1,340	\$ 1,340	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,943	\$ 3,549	\$ 394	394	1	
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,581	\$ 4,581	\$ -			
Pensacola		\$ 627	\$ 627	\$ -			
Pensacola		\$ 3,780	\$ 3,780	\$ -			
Montgomery		\$ 3,155	\$ 3,155	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 789	\$ 789	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,337	\$ 4,731	\$ (394)			394
Montgomery		\$ 394	\$ 394	\$ -			
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Mobile		\$ 2,760	\$ 2,366	\$ 394	394	1	
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,337	\$ 4,337	\$ -			
Mobile		\$ 394	\$ 394	\$ -			
Pensacola		\$ 4,731	\$ 4,338	\$ 393	393	1	
School of Cosmetology		\$ 3,781	\$ 3,781	\$ -			
Montgomery		\$ 497	\$ 497	\$ -			
Montgomery		\$ 414	\$ 414	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,181	\$ 2,181	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 1,577	\$ 789	\$ 788	788	1	

Montgomery	(b)(6); (b)(7)(C)	\$ 789	\$ 789	\$ -			
Pensacola		\$ 1,281	\$ 1,281	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 1,577	\$ 2,366	\$ (789)			789
Pensacola		\$ 1,578	\$ 1,578	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,254	\$ 1,254	\$ -			
Montgomery		\$ 1,972	\$ 1,972	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,381	\$ 1,381	\$ -			
Mobile		\$ 3,154	\$ 1,577	\$ 1,577	1577	1	
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 530	\$ 530	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 2,121	\$ 2,121	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,183	\$ 394	394	1	
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,181	\$ 3,181	\$ -			
Pensacola		\$ 3,981	\$ 3,981	\$ -			
School of Cosmetology		\$ 1,787	\$ 1,787	\$ -			
Montgomery		\$ 2,081	\$ 2,081	\$ -			
Montgomery		\$ 3,155	\$ 3,155	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 614	\$ 614	\$ -			
Mobile		\$ 1,111	\$ 1,111	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,581	\$ 4,581	\$ -			
Mobile		\$ 2,381	\$ 2,381	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 1,972	\$ 1,972	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 395	\$ 395	\$ -			
Pensacola		\$ 1,394	\$ 1,046	\$ 348	348	1	
Montgomery		\$ 3,482	\$ 3,482	\$ -			
Montgomery		\$ 2,901	\$ 2,901	\$ -			
Montgomery		\$ 2,781	\$ 1,391	\$ 1,390	1390	1	

Mobile	(b)(6); (b)(7)(C)	\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 890	\$ 890	\$ -			
School of Cosmetology		\$ 789	\$ 789	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 794	\$ 794	\$ -			
Montgomery		\$ 3,481	\$ 3,481	\$ -			
Montgomery		\$ 3,943	\$ 4,731	\$ (788)			788
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 2,223	\$ 2,223	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 4,730	\$ 4,730	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 394	\$ 394	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 4,681	\$ 4,681	\$ -			
Mobile		\$ 3,943	\$ 3,943	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
School of Cosmetology		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 1,027	\$ 514	\$ 513	513	1	

Mobile	(b)(6); (b)(7)(C)	1,971	\$ 1,971	\$ -			
Montgomery		1,972	\$ 2,366	\$ (394)			394
Montgomery		1,577	\$ 1,577	\$ -			
Montgomery		1,577	\$ 1,577	\$ -			
Pensacola		1,681	\$ 1,540	\$ 141	141	1	
Montgomery		1,577	\$ 1,577	\$ -			
Pensacola		1,577	\$ 1,577	\$ -			
Montgomery		4,731	\$ 4,731	\$ -			
Montgomery		1,094	\$ 1,094	\$ -			
Mobile		3,154	\$ 3,154	\$ -			
Mobile		4,731	\$ 4,731	\$ -			
Montgomery		789	\$ 789	\$ -			
Pensacola		3,154	\$ 3,549	\$ (395)			395
Montgomery		1,578	\$ 1,578	\$ -			
Pensacola		1,577	\$ 1,577	\$ -			
Pensacola		2,366	\$ 2,366	\$ -			
Pensacola		2,651	\$ 3,361	\$ (710)			710
Mobile		1,183	\$ 1,183	\$ -			
Pensacola		-	\$ -	\$ -			
School of Cosmetology		3,943	\$ 3,943	\$ -			
Mobile		789	\$ 789	\$ -			
Montgomery		1,577	\$ 1,183	\$ 394	394	1	
Montgomery		1,577	\$ 1,577	\$ -			
Pensacola		1,577	\$ 1,577	\$ -			
School of Cosmetology		789	\$ 1,577	\$ (788)			788
Montgomery		4,731	\$ 4,731	\$ -			
Mobile		394	\$ 394	\$ -			
Pensacola		4,731	\$ 4,337	\$ 394	394	1	
Mobile		4,281	\$ 4,281	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 2,382	\$ 2,382	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 1,255	\$ 1,410	\$ (155)			155
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 789	\$ 789	\$ -			
Mobile		\$ 1,183	\$ 1,183	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,183	\$ 394	394	1	
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 630	\$ 630	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Montgomery		\$ 2,761	\$ 2,761	\$ -			
Montgomery		\$ 1,972	\$ 1,972	\$ -			
Pensacola		\$ 1,184	\$ 1,184	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
Pensacola		\$ 1,577	\$ 395	\$ 1,182	1182	1	
Mobile		\$ 891	\$ 891	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 3,154	\$ 3,154	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 394	\$ 394	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 2,581	\$ 2,366	\$ 215	215	1	
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 2,454	\$ 2,454	\$ -			
Montgomery		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 891	\$ 891	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,094	\$ 1,094	\$ -			
Pensacola		\$ 447	\$ 447	\$ -			
Mobile		\$ 1,981	\$ 1,981	\$ -			
Pensacola		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 2,181	\$ 2,181	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 2,481	\$ 2,481	\$ -			
Pensacola		\$ 394	\$ 394	\$ -			
Mobile		\$ 394	\$ 394	\$ -			
Pensacola		\$ 3,943	\$ 3,943	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,943	\$ 4,337	\$ (394)			394
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,881	\$ 1,881	\$ -			
Mobile		\$ 3,481	\$ 3,481	\$ -			

Mobile	(b)(6); (b)(7)(C)	\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 664	\$ 664	\$ -			
Pensacola		\$ 2,681	\$ 2,681	\$ -			
School of Cosmetology		\$ 1,788	\$ 894	\$ 894	894	1	
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 3,182	\$ 3,182	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 394	\$ 394	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 3,154	\$ 3,154	\$ -			
Pensacola		\$ 3,155	\$ 3,155	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,183	\$ 394	394	1	
Montgomery		\$ 3,943	\$ 3,943	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,183	\$ 1,183	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 3,943	\$ 4,337	\$ (394)			394
Mobile		\$ 4,731	\$ 4,731	\$ -			

Pensacola	(b)(6); (b)(7)(C)	\$ 4,680	\$ 4,680	\$ -			
Montgomery		\$ 1,260	\$ 1,260	\$ -			
Pensacola		\$ 1,194	\$ 1,493	\$ (299)			299
Montgomery		\$ 282	\$ 282	\$ -			
Montgomery		\$ 2,462	\$ 3,281	\$ (819)			819
Pensacola		\$ 770	\$ 770	\$ -			
Mobile		\$ 3,581	\$ 3,581	\$ -			
Pensacola		\$ 3,281	\$ 3,281	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 1,577	\$ 3,943	\$ (2,366)			2,366
School of Cosmetology		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 394	\$ 394	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 394	\$ 394	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 1,181	\$ 1,083	\$ 98	98	1	
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ -	\$ -	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 2,760	\$ 2,760	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Pensacola		\$ 4,381	\$ 2,922	\$ 1,459	1459	1	
Mobile		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,577	\$ -			
Mobile		\$ 3,981	\$ 3,981	\$ -			

Montgomery	(b)(6); (b)(7)(C)	\$ 1,577	\$ 1,577	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
School of Cosmetology		\$ 4,731	\$ 4,731	\$ -			
Mobile		\$ 1,577	\$ 1,184	\$ 393	393	1	
Mobile		\$ 1,183	\$ 1,183	\$ -			
Montgomery		\$ 789	\$ 789	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 2,366	\$ 2,366	\$ -			
Pensacola		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,481	\$ 4,481	\$ -			
Mobile		\$ 1,521	\$ 1,521	\$ -			
Montgomery		\$ 3,481	\$ 3,481	\$ -			
School of Cosmetology		\$ 1,521	\$ 1,521	\$ -			
Pensacola		\$ 789	\$ 789	\$ -			
Montgomery		\$ 1,577	\$ 1,577	\$ -			
Montgomery		\$ 3,154	\$ 3,154	\$ -			
Mobile		\$ 2,366	\$ 2,366	\$ -			
Mobile		\$ 4,731	\$ 4,731	\$ -			
Pensacola		\$ 394	\$ 394	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
Montgomery		\$ 4,731	\$ 4,731	\$ -			
					\$ 49,161	\$ 55,674	

Appendix N

Finding 7: FWS Students Working During Class Hours File Review

Fortis College

OPE ID 023410

PRCN: 2012-4-04-28049

Response to Finding 7. Federal Work Study Violations-
Student Working During Class Hours

Summary	
Student Name	Federal Portion of Liability
(b)(6); (b)(7)(C)	\$ 5.06
	\$ 15.19
	\$ 16.88
	\$ 48.94
	\$ 54.00
	\$ 151.27
	\$ 12.50
	\$ 15.19
	\$ 15.19
	\$ 3.75
	\$ 17.50
	\$ 415.73
	\$ 771.19
Total	\$ 771.19

Fortis College

OPE ID 023410

PRCN: 2012-4-04-28049

Response to Finding 7. Federal Work Study Violations-
Student Working During Class Hours

Summary	
Student Name	Federal Portion of Liability
(b)(6); (b)(7)(C)	\$ 73.28
	\$ 48.26
	\$ 2.78
	\$ 74.42
	\$ 41.91
	\$ 17.49
	\$ 44.94
	\$ 223.66
	\$ 116.28
	\$ 8.33
	\$ 2.07
	\$ 108.06
	\$ 9.62
	\$ 56.68
	\$ 4.78
	\$ 355.28
	\$ 191.63
	\$ 11.31
	\$ 1,390.76
Total	\$ 1,390.76

Appendix O

Finding 5: Email for Repayment for FWS Students

James, Angelique

From: Felicia Williams <FWilliams@edaff.com>
Sent: Wednesday, October 02, 2013 9:44 AM
To: James, Angelique
Subject: Fortis College - Mobile, Alabama: Program Review Report - Response

Ms. James,

Finding 5: FWS Violations – Improper Payments to Students/Improper Hours on Time Sheet The payment of \$274.18 was sent back to FWS. Our G/L and FWS Activity Reports for Mobile both reflect the following student refunds returned on 8/9/13:

(b)(6); (b)(7)(C)	AY 11/12	\$10.18	(b)(6); (b)(7)(C)
-------------------	----------	---------	-------------------

 AY 09/10 \$240.00 . Below is the G5 screen shot which confirms that the above noted refunds were received and processed by G5.

Thanks,

Felicia Williams
Regional Financial Aid Director



You are here: Payments > Refunds > Refunds Inquiry

Inquire Refunds

[Inquire A Refund](#)

DUNS: 11804633 Institution: CAPES COLLEGE, INC.

Search Criteria Key Terms Search Clear

Start Date (MM/DD/YYYY)

End Date (MM/DD/YYYY)

1 - 3 of 3 Open Awards

Total Records: 3 Page 1 of 1 Jump to Page Go

Tracking No.	Award No.	Net Draws	Award Reference	Refund Amount	Bank Account	Refund Request Date	Refund Status
R130201442	R031AC4382	-\$5062.00	2013-09-10	\$0.00	*****5481	Aug 9, 2013	Settled
R130202403	R037AC1000	-\$7988.00	11-12 FWS	\$0.00	*****5481	Aug 9, 2013	Settled
R130202196	R137AC125548	-\$3154304.00	11/13 371	\$0.00	*****5473	Aug 9, 2013	Settled

Total Records: 3 Page 1 of 1 Jump to Page Go

< Previous Cancel



James, Angelique

From: Felicia Williams <FWilliams@edaff.com>
Sent: Thursday, October 31, 2013 10:29 AM
To: James, Angelique
Subject: RE: Fortis College - Mobile, Alabama: Program Review Report - Response
Attachments: CAP655 SCREENSHOT-G5 RETURN OF REFUNDS .docx

Ms. James,

Here is the screenshot of the refunds.

Thanks and have a great day!

Felicia Williams

From: James, Angelique [mailto:Angelique.James@ed.gov]
Sent: Tuesday, October 22, 2013 3:07 PM
To: Felicia Williams
Subject: RE: Fortis College - Mobile, Alabama: Program Review Report - Response

Did you make the refunds for the students in Finding #7 yet? If you haven't done it yet it is fine I can just add it to the report.

Thanks,

Angelique James
Institutional Review Specialist
Department of Education
Federal Student Aid
404-974-9441

<http://www.ed.gov/>

<http://studentaid.ed.gov/home>

Federal Student Aid
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

PROUD SPONSOR of
the AMERICAN MIND

From: Felicia Williams [mailto:FWilliams@edaff.com]
Sent: Tuesday, October 01, 2013 10:47 AM
To: James, Angelique
Subject: RE: Fortis College - Mobile, Alabama: Program Review Report - Response

Ms. James,

Finding 1: Ineligible High School Diploma: Our Internal Auditor, Rocco Salpeck, CPA will call you directly regarding the test (B.2.e) that verified that the date of the high school diploma preceded the start date of the student's first day of class as reported on the College's attendance records.

Finding 5: FWS Violations – Improper Payments to Students/Improper Hours on Time Sheet For the payment of \$274.18, was this payment sent back to FWS or Pell? The payment of \$274.18 was sent back to FWS. Our G/L and FWS

Activity Reports for Mobile both reflect the following student refunds returned on 8/9/13: (b)(6); (b)(7)(C) AY
11/12 \$10.18 (b)(6); (b)(7)(C) AY 09/10 \$240.00. Unfortunately, G5 is unavailable to us today, I will send the screen
shots as soon as they are available.

Finding 7: FWS – Students Working During Class Did you already pay back the sample student's (Student 7, 10, 33, 42, 43)? We will make the refunds and send you the confirmation.

Thanks,

Felicia Williams
Regional Financial Aid Director

From: James, Angelique [mailto:Angelique.James@ed.gov]
Sent: Monday, September 30, 2013 11:18 AM
To: Felicia Williams
Subject: RE: Fortis College - Mobile, Alabama: Program Review Report - Response

Ms. Williams,

I had a couple of questions while reviewing your Program Review Report Response.

Finding 1: Ineligible High School Diploma On the auditor's agreed upon procedures that we approved dated April 18, 2013, there was a test (B.2.e) that would verify that the date of the high school diploma preceded the start date of the student's first day of class as reported on the College's attendance records. However, I don't see that test on the procedures submitted. What happened to that test?

Finding 5: FWS Violations – Improper Payments to Students/Improper Hours on Time Sheet For the payment of \$274.18, was this payment sent back to FWS or Pell?

Finding 7: FWS – Students Working During Class Did you already pay back the sample student's (Student 7, 10, 33, 42, 43) FWS amounts since they were not included in the sample or were you waiting for the Final Program Review Determination Letter (FPRD)?

Thanks,

Angelique James
Institutional Review Specialist
Department of Education
Federal Student Aid
404-974-9441
<http://www.ed.gov/>
<http://studentaid.ed.gov/home>

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[Create Refunds](#)

[Create Refunds](#)

[Summary](#)

[Confirmation](#)

DUNS: 118046333 Institution: CAPPS COLLEGE, INC.

- ✓ The action was successful: The request for \$771.20 for account 5481 has been assigned tracking number: R1310299585.
- ✓ The action was successful: The request for \$1390.78 for account 5481 has been assigned tracking number: R1310299586.

Refund Request Successfully Created

The refund(s) below were submitted. You may create additional refunds or return to the GS homepage.

Your Open Awards

Total Records: 2 [Page 1 of 1](#) Jump to Page [Go](#)

<u>Award No.</u>	<u>Net Draws</u>	<u>Award Reference</u>	<u>Bank Reference</u>	<u>Bank Account</u>	<u>Refund Amount</u>	<u>Refund ID</u>
P033A087782	-\$89301.00	FWS 08-09	PELL ACCOUNT	*****5481	771.20	R1310299585
P033A117782	-\$79989.82	11-12 FWS	PELL ACCOUNT	*****5481	1390.78	R1310299586

Total Records: 2 [Page 1 of 1](#) Jump to Page [Go](#)

Miscellaneous Awards

Total Records: 0 [Page 1 of 1](#) Jump to Page [Go](#)

Appendix P

FEDWIRE

FEDWIRE Form

DEPARTMENT OF EDUCATION FED-WIRE EFT MESSAGE FORMAT & INSTRUCTIONS		
ABA Number 021030004	Type/Sub-Type	
Sender No.:	Sender Ref. No.	Amount <div style="text-align: center; font-size: 1.2em;">①</div>
Sender Name (Automatically inserted by the Federal Reserve Bank)		
Treasury Department Name/CTR/ TREAS NYC / CTR /		
BNF=ED / AC - 91020001 ORI=		
Name / City / State: <div style="text-align: center; font-size: 1.2em;">②</div>		
DUNS / TIN: <div style="text-align: center; font-size: 1.2em;">③</div>		
FOR: <div style="text-align: center; font-size: 1.2em;">④</div>		
INSTRUCTIONS		
A. Complete circled items 1-4 above as follows: <div style="margin-left: 40px;"><div>① Indicate amount including cents digits.</div><div>② Indicate Name, City, and State.</div><div>③ Indicate DUNS Number and Taxpayer Identification Number (TIN).</div><div>④ Enter the reason for the remittance: Bill Number / Document Number / Other.</div></div>		
B. Provide the sending bank with a copy of the completed form. This form contains other information the bank will need to transmit the FEDWIRE message.		

Accounting Document – Prior Year Monetary Recovery (AD-PYMR)

Institution: Fortis College - Mobile

City, State: Mobile, Alabama

PRCN: 240428049

TIN: 631048908

DUNS: 118046333

Reviewer: Angelique James

Region: Atlanta

Date: March 10, 2014

Section A - Use if no adjustments are being made in COD

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Closed AY)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
ACG	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
National SMART	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FSEOG (No FISAP Corrections)	Principal	\$9,123.75	3220RNOYR	69017
	Interest	\$382.24	1435RNOYR	64020
FWS (No FISAP Corrections)	Principal	\$2,378.09	3220RNOYR	69017
	Interest	\$98.31	1435RNOYR	64020
Direct Loan and Direct Loan EAL	Principal	\$36,980.62	4253XNOYR	53020 or 53010
	Interest		4253XNOYR	53040
FFEL and FFEL EAL	Interest/ SA/EAL		4251XNOYR	53020
Federal Perkins	Principal		2915RNOYR	53054

Section B: Use if the Institution is instructed to make adjustments in COD

Add rows if necessary			Amount			G5 Program Award # *
Pell, ACG, SMART, TEACH	Pell 2009	Principal	\$49,161	3875FNOYR	69020	P063P084227
	Pell 2009	Imputed Interest	\$7,652.79	1435RNOYR	64020	P063P084227
Pell, ACG, SMART, TEACH	Pell 2010	Principal	\$1,043,275	3875FNOYR	69020	P063P104227
	Pell 2010	Imputed Interest	\$43,707.59	1435RNOYR	64020	P063P104227
Direct Loan (do not use for estimated loss)	Award Year	Principal		3875FNOYR	69020	
	Award Year	Imputed Interest		4253XNOYR	53040	

Comments:

* G5 Award # (P063P104306, first 5 digits = program, next 2 digits = award year, next 4 digits = code unique to school). Note: It is important that the year in the G5 award number correspond to the award year for which any adjustments are being made, or for which the balance has been incurred (in the case of an unsubstantiated cash or negative cash balance). If the reviewer is unsure after looking in G5, contact Susan Lewey for Pell or DL, or Tremia Haythe for FWS or FSEOG.

Example of G5 award numbers for a single school for the 2009-2010 award year, Pell vs. DL:

Pell is designated by "P063P" and DL is designated by "P268K"

P063P091445 (Pell 2009-2010 award - Pell uses the final two digits of the leading award year in the award number)

P268K101445 (Direct Loan 2009-2010 award - DL uses the final two digits of the trailing award year in the award number)

Example of G5 award number for FWS and FSEOG

FWS is designated by "P033A" and FSEOG is designated by "P007A"

P033A092121 (FWS 2009-2010 award - FWS uses the final two digits of the leading award year in the award number)

P007A092121 (FSEOG 2009-2010 award - FSEOG uses the final two digits of the leading award year in the award number)

See FPRD Distribution Form for distribution information for this form and related program review documents.

Checklist - FPRD Review		
Responsible Reviewer: <u>Angeliqne James</u>		Delivery Tracking #:
Institution Name: <u>Fortis College - Mobile</u>		
OPE ID: <u>023410</u>	PRCN: <u>2012-4-04-28049</u>	
Date: <u>10/30/13 - 3/10/14</u>		
Cover Letter		
<input checked="" type="checkbox"/>	Letter is addressed to the correct person	
<input checked="" type="checkbox"/>	Letter includes certified mail information	
<input checked="" type="checkbox"/>	Correct standard paragraphs included	
FPRD Report		
<input checked="" type="checkbox"/>	Correct type of FPRD drafted (FPRD – No Further Action Required; FPRD – Further Action Required; FPRD – No Program Review Report Issued; FPRD – Closed School Loan Discharges)	
<input checked="" type="checkbox"/>	FPRD prepared in accordance with standard procedures	
<input checked="" type="checkbox"/>	Findings and Final Determinations correctly stated	
<input checked="" type="checkbox"/>	Citations are appropriate to the findings and cited correctly	
<input checked="" type="checkbox"/>	Description of each instance of noncompliance is sufficiently detailed to clearly identify the institution's regulatory violations	
<input checked="" type="checkbox"/>	Summary of Liabilities included with correct amounts	
<input checked="" type="checkbox"/>	Payment Instructions prepared correctly	
<input checked="" type="checkbox"/>	Student Sample Appendix is properly prepared with only first and last names and last four digits of students' SSNs	
<input checked="" type="checkbox"/>	Other appendices, if any, are properly prepared or enclosed as attachments	
PEPS Data Entry Worksheet		
<input checked="" type="checkbox"/>	PEPS Data Entry form correctly completed (including repayment method and liability amounts) Level of Review accurately reflects the deficiencies	
<u>n/a</u>	For FPRD - No Program Review Report Issued only: Deficiency codes are appropriate to the findings	
Approvals		
<input checked="" type="checkbox"/>	For FPRDs with liabilities of at least \$100,000 but less than \$1,000,000, approval obtained from OGC	
<input checked="" type="checkbox"/>	For FPRDs with liabilities of \$1,000,000 or more, approval obtained from OGC and SESG General Manager	
CM Signature:	<u>(b)(6); (b)(7)(C)</u>	Date: <u>2/12/2014</u>
DD Signature:		Date: